Silverchain Group Modern Slavery Statement 2023-24

31 December 2024

1.   Introduction

This Modern Slavery Statement (**Statement**) covers the activities of Silver Chain Group Limited ACN 077 082 725 (**Silverchain**) and each of its wholly owned subsidiaries for the relevant period.

Silverchain has a rich history as pioneers, innovators and leaders of care in the home. For over 130-years as a not-for-profit, Silverchain has provided high-quality, complete care in the home to multiple generations of Australians, supported by our dedicated and accomplished employees across the country. Our aspiration is to create a better home care system for all Australians.

Silverchain is the leading provider of complete in-home care services in Australia, supporting 115,000 people of all ages each year, across a range of services in their homes including hospital in the home, palliative care, aged care (Home Care Packages and Commonwealth Home Support Programme), allied health and social support, and virtual care monitoring.

As a national leader in home care, our aspiration is to deliver world class health and aged care in the home so that Australians can confidently remain in their homes and live their lives as they choose. The provision of our services includes our commitment to impactful and ethical operations, and to addressing modern slavery risks within our organisation and supply chains as well as in the wider community.

It is in this context that we submit our fifth Statement, made in compliance with the *Modern Slavery Act 2018* (Cth), in respect of the period 1 July 2023 to 30 June 2024.

For more information about Silverchain, visit www.silverchain.org.au.

2.   Reporting Entity

For the relevant reporting period, Silverchain was a Public Company Limited by Guarantee, with the following wholly owned subsidiaries:

- Access Care Network Australia Pty Ltd (ACN 601 017 430) (**ACNA**).
- Silver Chain - Victoria Limited (ACN 649 647 914) (a public company limited by guarantee);
- Royal District Nursing Service of SA Limited (ACN 15 858 025) (a public company limited by guarantee); and
- Silver Chain Foundation Incorporated (ACN 077 086 670) (a West Australian registered Incorporated Association) now known as Silverchain Foundation Limited.

Silverchain and its subsidiaries are all registered charities with the Australian Charities and Not-for-Profit Commission.

3.   Governance

Silverchain's corporate governance is established through company constitutional documents, a Board Governance Charter and a Delegations Policy. Silverchain also has in place an Intercompany Agreement and Subsidiary Governance Protocol for the management of ACNA, and a Subsidiary Governance Protocol for the management of the remaining subsidiaries. The Board is assisted by Board sub-committees, comprised of members of the Board and external members, and is supported by the Silverchain Group Executive team.

Representatives from each subsidiary either sit on the Modern Slavery Working Group or the Group Executive. Review of modern slavery risk areas is conducted for the Silverchain Group as a whole.

4.   Modern Slavery Risk Areas

Silverchain has identified and focussed on two key risk areas for modern slavery within its operations:

- Supply chain; and
- Labour hire and frontline operations.

Supply chain

Silverchain's supply chain includes a diverse array of over 2,400 suppliers across a variety of procurement categories. Our annual spend exceeded $154 million in the financial year 2023/2024.

Our supply chain is predominantly indirect procurement, focussing on the purchase of products and services needed to support day-to-day operations including personal protective equipment, vehicles and maintenance, uniforms, medical supplies and equipment, and information technology products and services.

After implementation in the financial year 2022/23, we continue to use and update our two new digital solutions, namely Microsoft Dynamics 365 Finance & Operations as our Procure-2-Pay system (**P2P System**) and a human capital management system SAP SuccessFactors (**Our People Portal**). These systems provide for improved visibility of suppliers, vendor spend, data integrity, increased governance and more contemporary development of staff. These resources will support the ability to identify suppliers to add to our modern slavery assessment work and allow more visibility and insight into employees, their engagement with Silverchain and professional development plans (inclusive of modern slavery training). Silverchain is committed to a process of continuous improvement and will explore opportunities to enhance our digital solutions in the future.

We continue to maintain just over 1,300 active supplier contracts which represent the current and critical suppliers for Silverchain's business operations. All direct suppliers with which we have a contractual arrangement are deemed as Tier-1 suppliers. These suppliers have been scored against modern slavery risk factors such as industry, country of origin, spend and workforce/labour type. For this financial year 40 suppliers were selected to complete self-assessment questionnaires (**SAQ**) and responses were used to verify their credentials and scrutinise their operations at a higher level. Silverchain's focus for this year was the Tier-1 suppliers providing labour hire, recruitment agencies, cleaning services, consultancy and also re-visiting the highest risk suppliers from the last reporting period.

As a result of the identification of modern slavery risk by industry groupings, we continue to administer the SAQ to each high-risk vendor to confirm or revise their risk designation and to determine the best way we can engage further.

While most of our Tier-1 suppliers are based in Australia, we acknowledge that many of our products are sourced from overseas. We anticipate our Tier-2 supply chain (primary suppliers to our Tier-1 suppliers) to be much more complex and intend to assess this data for selected high-risk suppliers as part of a future phase in addressing modern slavery risks. We currently take contractual measures to ensure our suppliers mitigate against modern slavery.

Our assessment of Tier-1 suppliers continues to identify the largest industry risk grouping being environmental and facilities services such as cleaning or waste control. The risk profile of this class of suppliers is elevated by the likely use of outsourced, temporary, migrant, or sub-contracted labour with less transparency over the conditions of employment. Silverchain engages more than 200 suppliers to provide these services. To address this high risk industry we have issued SAQs to the high volume/high spend suppliers and ensured every supplier contract contains modern slavery obligations. Silverchain is finalising a tender for the provision of national cleaning services, which will allow us further insight and scrutiny into the industry and suppliers.

Labour hire and frontline operations

As a health and aged care organisation, we are reliant on a workforce of nurses, care staff and casual workers, some of whom work in Australia under a visa arrangement or are engaged through labour hire agencies. We are aware of the modern slavery risks associated with the visa process, including but not limited to deceptive recruitment of labour or services, debt bondage and people trafficking.

For any labour hire, recruitment or agency partnerships, we have ensured that Silverchain's contractual relationship with each vendor contains anti-slavery clauses, reporting and auditing mechanisms. Silverchain recruitment continues to work closely with these vendors to understand their processes for managing and eliminating modern slavery risks.

Silverchain has also developed a comprehensive international recruitment process for direct employees, which includes ensuring comparative working conditions and an introduction to Australia. We have

established contractual relationships with international and national recruitment agencies who provide services to identify potential new employees.

Not all instances of modern slavery will be identified at the recruitment stage. Silverchain recognises the valuable and unique insight our frontline workforce has "on the ground" – in homes, with other employees or hired workers, outside of corporate settings. Therefore, it is pertinent for Silverchain to inform, train and raise awareness of modern slavery risks in our operations to all employees.

5. Actions Taken to Address Modern Slavery in FY 2023/24

For financial year 2023/24 Silverchain undertook the following coordinated actions to mitigate modern slavery risks:

- The Modern Slavery Working Group continued to meet on a monthly basis to review actions, set goals, engage stakeholders and maintain accountability.
- Modern Slavery Working Group was reconfigured to better align with the business structure to maximise the input and effectiveness of the group.
- The Procurement Team administered the Modern Slavery Self-Assessment Questionnaire (**SAQ**) to tier-1 suppliers designated by our supply chain assessment to be higher risk suppliers (determined by high spend, industry, location and previous high-risk assessment). This SAQ is administered on an annual basis.
- Incorporated modern slavery requirements and compliance for all tenders.
- The Contracts & Procurement Team worked closely with Group Capability to ensure the online learning module developed in FY23 is being utilised, focussing on modern slavery awareness and prevention. This is currently sitting at over 40% completion for a voluntary awareness learning module.

6. Further Actions Scheduled to Address Modern Slavery Risks

As part of our continued commitment to preventing modern slavery, Silverchain plans to undertake the following actions over the next reporting period and ongoing:
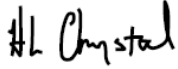
- Refining of SAQs and continued assessment and review of supply chains.
- Engagement and partnership with high-risk suppliers, particularly HR/labour hire agencies.
- Ongoing use of the Risk Assessment Tool, with input of new data, monitoring of risk ratings and updating with current international news and events.
- Preliminary assessment of Tier 2 suppliers (ie supply chains of our direct suppliers).
- Release of the modern slavery learning module for all Silverchain employees (note this was launched 20 Oct 2023) and continued monitoring of completion.
- Working closely with the Communications Team to develop organisation-wide, targeted and even external communications regarding modern slavery awareness and Silverchain's commitment.
- Development of clear lines of prevention and reporting.

Silverchain will continue to assess the effectiveness of its actions taken to address modern slavery through the following mechanisms:

- Continued and expanded SAQ completion requests covering a wider range of industries.
- Increased involvement of internal stakeholders across Silverchain and its subsidiaries, including further representation on the Modern Slavery Working Group.
- Ongoing assessment of participation percentages for the modern slavery learning module.
- Targeted and regular communication and awareness of the modern slavery learning module to increase uptake.
- Monitoring of any internal feedback, engagement or reporting pathways to confirm effective understanding and awareness.
- Monitoring business spend to identify new suppliers to engage on contracts compliance with modern slavery legislation and response to SAQ.

7.   Approval

This Statement has been approved by the Board of Silverchain and is submitted on behalf of Silverchain, its wholly owned subsidiaries, and is signed for and on behalf of all such entities.

Haydn Chrystal
Silverchain Board Chair

Dale Fisher
Chief Executive Officer

Health. Human. Home.