

**FY25 Modern
Slavery Statement**

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Introduction

Eldercare Australia Ltd (“**Eldercare**”, “**we**”, “**our**”, “**us**”) is one of South Australia’s leading aged care and retirement living providers. Our residents and our local community are at the heart of what we do and our governance decisions around benefiting our residents and the community around us.

Eldercare takes genuine steps to identify and mitigate risks of modern slavery in our operations and supply chains. Addressing modern slavery risks aligns with our core values of *Respect, Accountability and Connection* and our Corporate Social Responsibility Strategy.

This modern slavery statement for the reporting period of 1 July 2024 to 30 June 2025 is our sixth modern slavery statement and addresses the mandatory requirements outlined in section 16 of the *Modern Slavery Act 2018* (Cth) (“**Act**”).

Using the deep knowledge that we have obtained over the last reporting periods, the key focus of the actions undertaken during this reporting period has been to conduct deep dive due diligence on suppliers through undertaking site audits.

We set this out in this modern slavery statement.

Reporting Entity | Eldercare Australia Ltd
Australian Business Number | 63 758 127 271
Head Office | 247 Fullarton Road, Eastwood SA 5063
Website | <https://www.eldercare.net.au>

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About Us

Eldercare has been caring for elderly South Australians since 1959. The wellbeing of our residents is central to everything that we do and is the centrepiece of our operational and governance decisions.

Eldercare operates in a highly regulated industry. We support our staff to provide consistent quality care to our residents. We are values driven and we aim to deliver peace of mind with our care.

We strive every day to maintain the ‘heart’ in our organisation while balancing this with adequately responding to a rigorous and evolving regulatory framework. We continue to prioritise modern slavery compliance and our role as a reporting entity to identify, remediate and report on modern slavery risks found in our organisation and supply chains.

Our modern slavery compliance framework aligns with our core values and allows us to ensure that there is respect, accountability, and connection in our broader community and throughout our supply chains.

Our Values

Respect

Accountability

Connection



We protect the dignity, rights and values of individuals



We are all responsible for working safely and with integrity



We develop vibrant and supportive relationships based on warmth and generosity

White Ribbon Workplace

We are very proud to have White Ribbon Workplace Accreditation for our efforts towards ending violence against women. We want to create a community that is safe and inclusive for our staff, our residents, their families and the broader community and ensure that they feel safe, welcome and cared for.

Rainbow Tick Accredited

Eldercare is proud to be a Rainbow Tick accredited organisation for the quality and performance of our LGBTQI inclusivity program and is the first South Australian residential aged care provider to receive accreditation.



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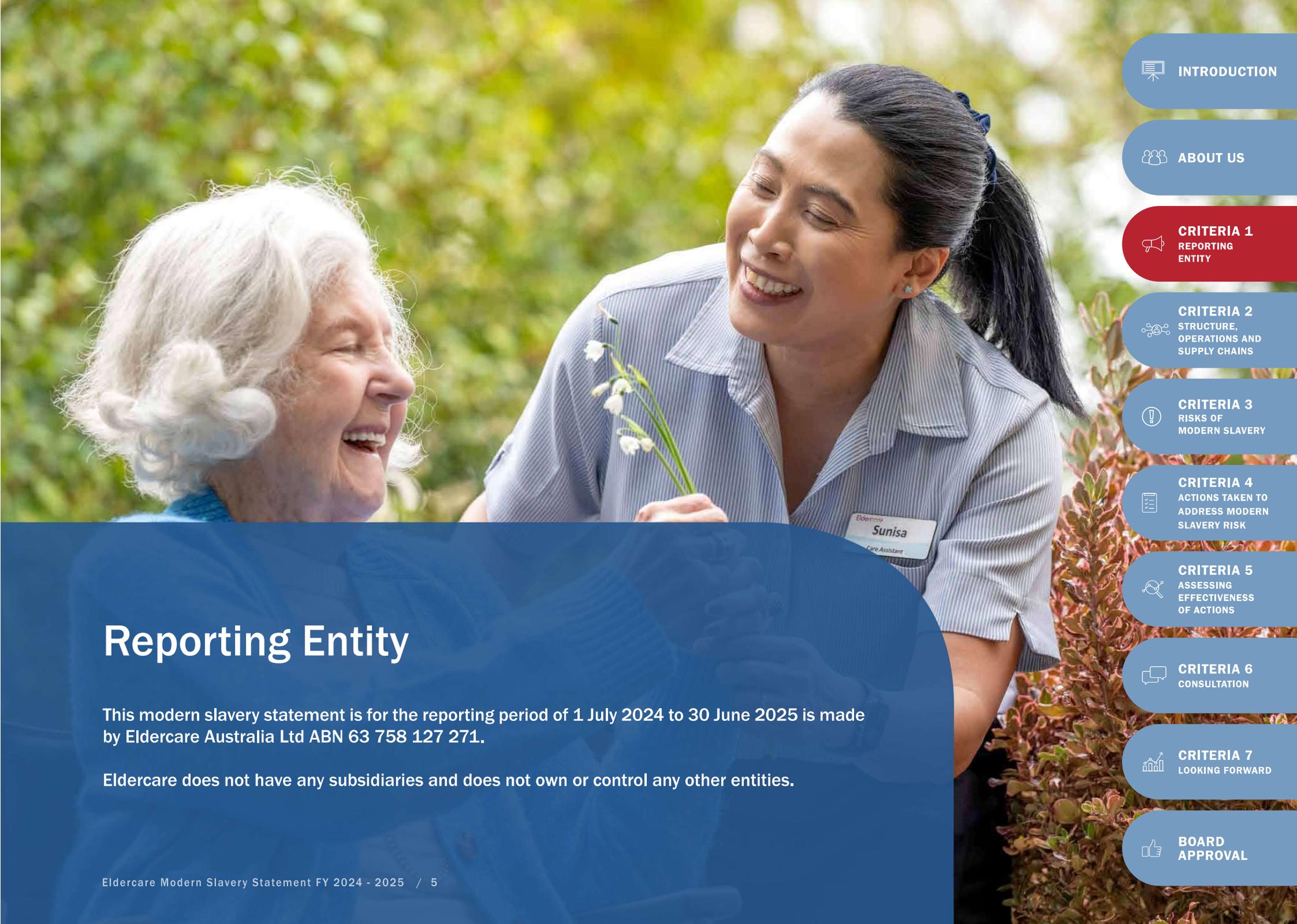
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Reporting Entity

This modern slavery statement is for the reporting period of 1 July 2024 to 30 June 2025 is made by Eldercare Australia Ltd ABN 63 758 127 271.

Eldercare does not have any subsidiaries and does not own or control any other entities.

Structure, Operations and Supply Chains

Structure

Eldercare is a not-for-profit organisation that is registered with the Australian Charities and Not-for-profits Commission (ACNC). Eldercare operates solely in South Australia with its headquarters at 247 Fullarton Road, Eastwood SA 5063.

We are governed by a Board which oversees our governance and compliance obligations. Our executive team lead the day-to-day operations of Eldercare.

Operations

Eldercare has been operating as an aged care provider for 65 years and cares for more than 1,146 residents across our 13 aged care homes across South Australia. Eldercare employs 2099 staff and has over 210 volunteers who support us and are vital to our operations. If required, Eldercare engages labour hire entities to assist with staff shortages (for example, nurses and personal carers). This is discussed further in Criteria 3 below.

In addition to our aged care homes, we support the community by providing:



426 independent living units
across our **14 retirement villages**



Allied health services which can assist over
300 clients at our day therapy centre

The wide range of services that we offer means that we can support and serve our community in a variety of ways, which helps to ensure that retirees and those needing support can come to us for support in various stages of their retirement and supported living journeys.

During the reporting period, our new 100 bed Goodwood aged care facility opened. Eldercare Goodwood introduces a new standard in aged care, providing state of the art facilities that prioritise the wellbeing and comfort of our residents. Eldercare Goodwood was designed with sustainability in mind and has been built with solar panels, rainwater and storm water collection and reuse in mind, achieving a 6-star Green Star rating design.

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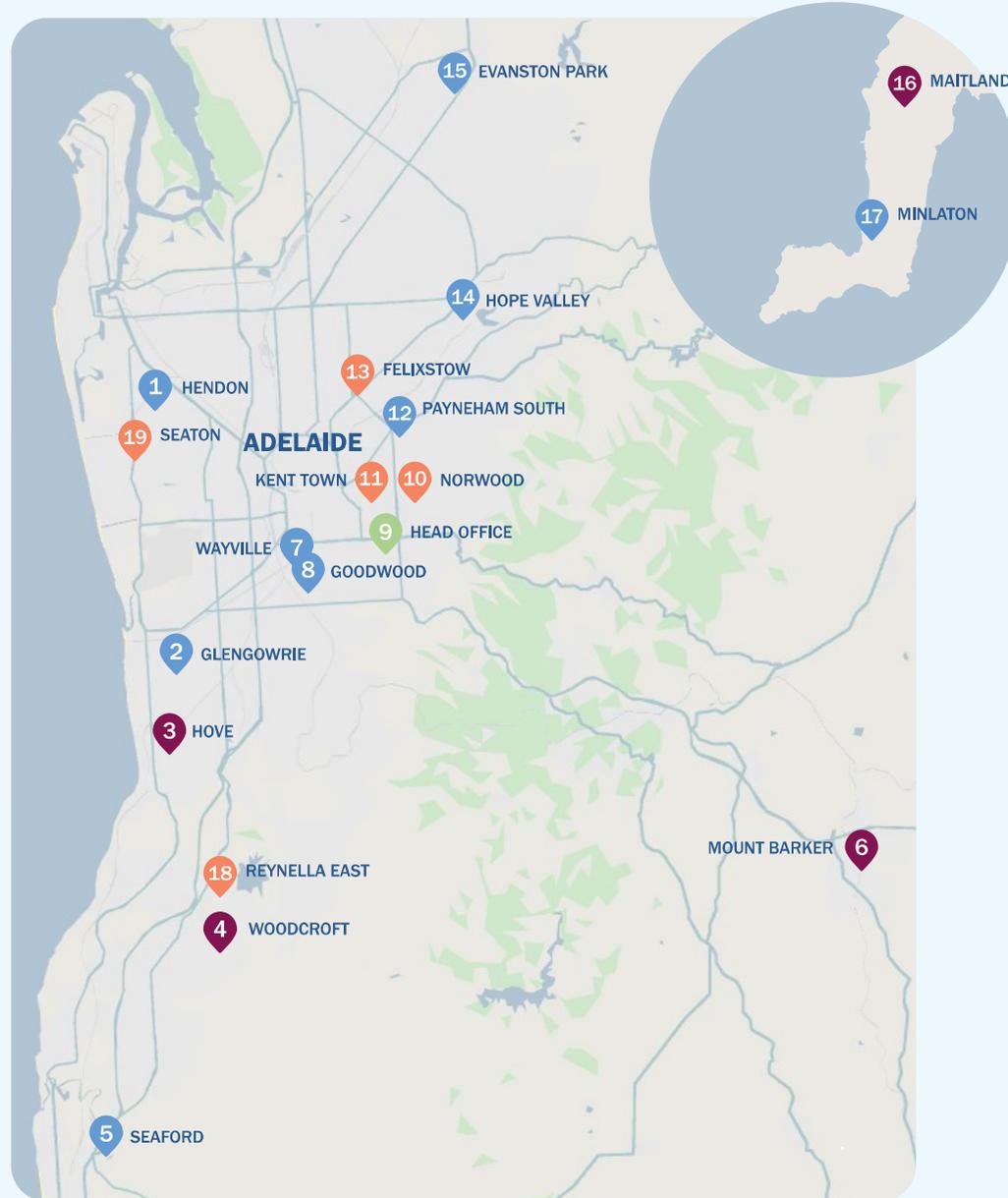
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Locations of Eldercare Sites

1. Acacia Court, Hendon
2. Allambi, Glengowrie
3. Oxford, Hove
4. Cottage Grove, Woodcroft
5. Seaford, Seaford
6. Sash Ferguson, Mount Barker
7. The Lodge, Wayville
8. Goodwood, Goodwood
9. Head Office, Eastwood
10. Kingsborough, Norwood
11. College Green, Kent Town
12. Trowbridge House, Payneham South
13. Mulberry Grove, Felixstow
14. Hope Valley, Hope Valley
15. Evanston Park, Evanston Park
16. The Village, Maitland
17. South Park, Minlaton
18. The Braes, Reynella East
19. Carisfield, Seaton

- Residential Site Only
- Retirement Living Site Only
- Co-Located Residential & Retirement Living
- Head Office



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Suppliers

Our suppliers are vital to our operations and our ability to maintain the high quality of care that we strive to achieve. We engage with suppliers that are focused on quality and are industry leaders in their respective sectors. Eldercare, as a proud South Australian based organisation, strives to engage local suppliers to support the local economy and community.

In this reporting period, Eldercare engaged with 708 suppliers. Eldercare prefers to engage long-term suppliers¹ and minimises one-off engagements with suppliers where possible.

In FY25, 42% of our total suppliers were long-term suppliers.

Supply Chains

We engage with a wide variety of suppliers across our operations to enable us to deliver our quality services to our residents. Our suppliers provide us with goods and services that help us to facilitate direct care to residents and otherwise support the provision of direct care to residents.

Suppliers that *facilitate* direct care to residents:

Our suppliers who provide goods and services which facilitate the provision of direct care to our residents assist us in providing the following key services:



¹We define a "long-term supplier" as a supplier who we have engaged with for 3 years or more.

Suppliers that *support* direct care to residents:

Our suppliers who provide ancillary support functions to the business can be categorised under the following categories:



Business administration

Professional and administrative services, consultancy, IT, insurance and head office support.



Property services

Utilities, maintenance to buildings and equipment, building projects and refurbishments.



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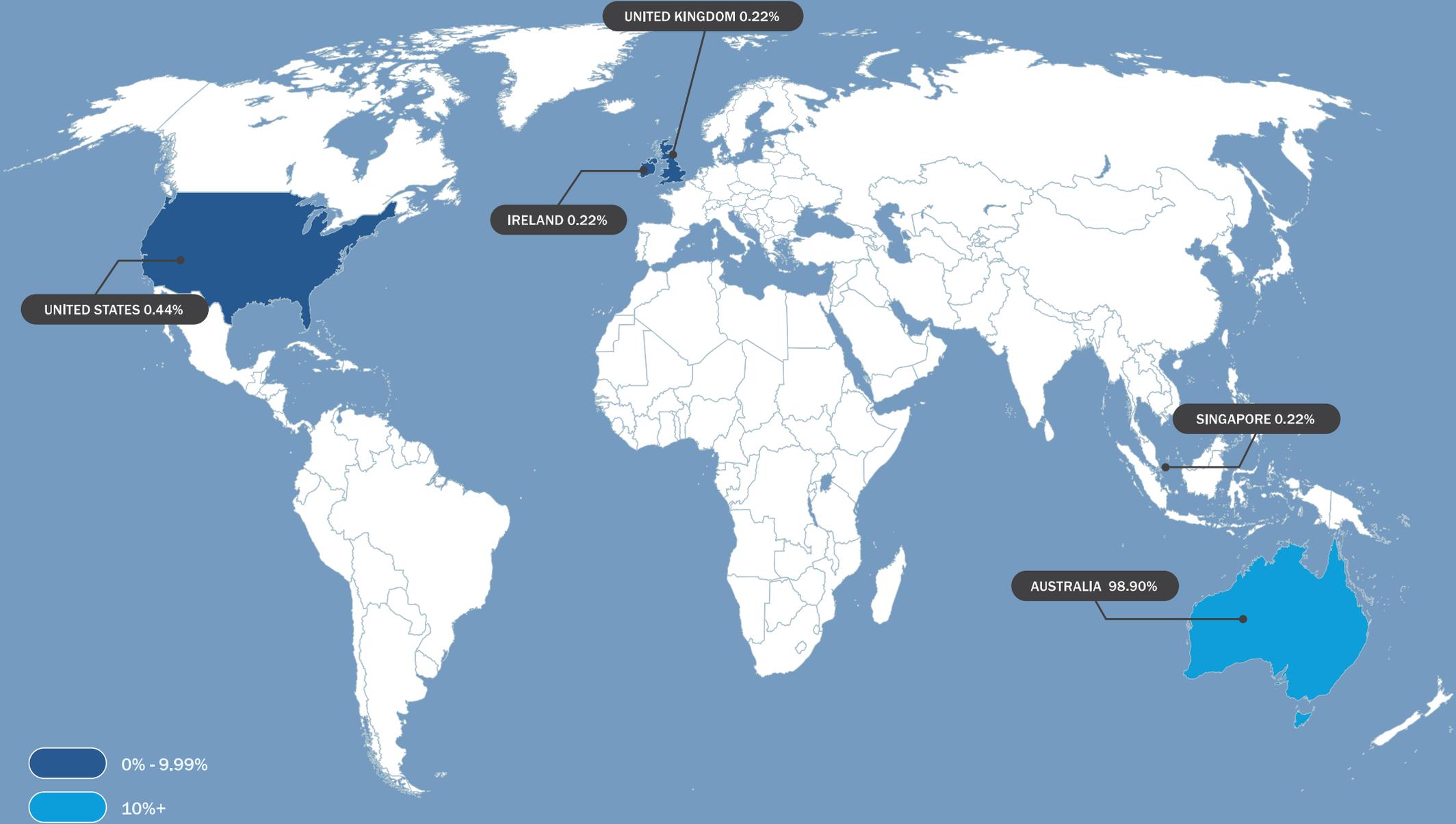


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Tier 1 Suppliers Operating Locations

Tier 1 Supplier: Immediate Eldercare Supplier

In the reporting period Eldercare continued to undertake detailed analysis regarding its tier 1 suppliers. The following map identifies the key locations of our tier 1 suppliers.

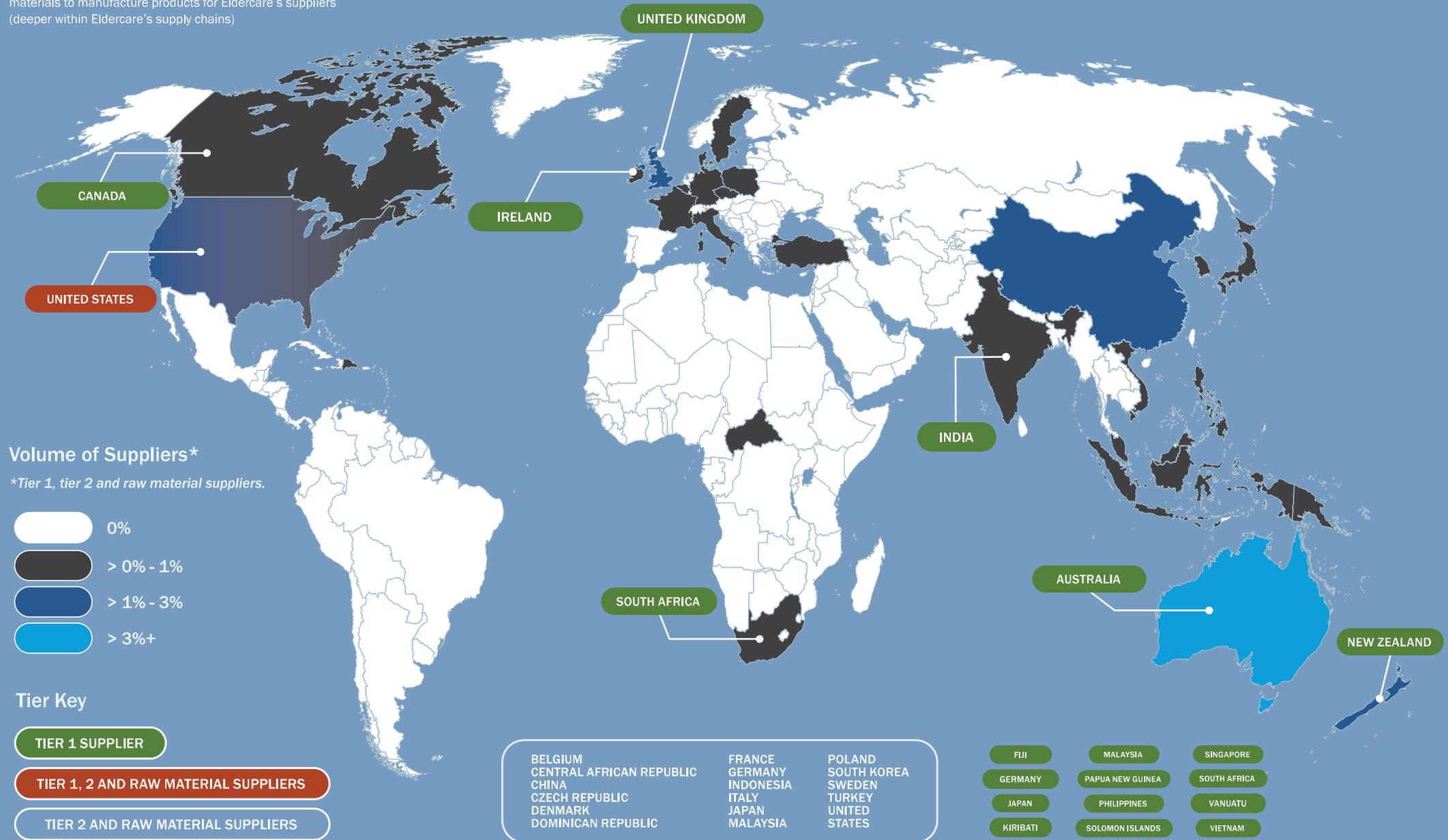


Tier 1, Tier 2 & Raw Material Suppliers

Tier 2 Supplier: Direct Supplier to Eldercare's Tier 1 Suppliers

Raw Material Supplier: Organisations that work with input materials to manufacture products for Eldercare's suppliers (deeper within Eldercare's supply chains)

In the reporting period Eldercare continued to undertake detailed analysis regarding its tier 1 suppliers and continued to look deeper into its supply chains beyond tier 1. The following map identifies the key locations of our suppliers and also closer analysis of suppliers deeper within our supply chains.



Risks of Modern Slavery

In each reporting period, Eldercare continually assesses the modern slavery risks in our operations and supply chains. This assessment takes into consideration newly identified risks and the growing maturity of our modern slavery compliance framework.

The UN Guiding Principles

To undertake this risk assessment, Eldercare utilises the *cause, contribute to and directly linked to* framework from the United Nations Guiding Principles on Business and Human Rights (“**UNGP’s**”). The UNGP’s guide our modern slavery risk assessment process and is used to assess whether Eldercare could be deemed to cause, contribute to or be directly linked to modern slavery, or any risk indicators of modern slavery.



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Risk matrix

A key function of Eldercare’s due diligence processes is Eldercare’s risk matrix which has been developed to assess suppliers against the following risk factors:

1. **Geographic risks** – specific risks associated with the jurisdiction in which the supplier operates. *For example, China (higher risk) vs Australia or New Zealand (lower risk).*
2. **Product and services risk** - specific risks associated with the product or service purchased by the reporting entity. *For example, linen (higher risk) vs accounting services (lower risk).*
3. **Entity risks** – specific risks associated with the supplier. *For example, the risks associated with a smaller, isolated factory (higher risk) vs a larger multi-national firm (lower risk).*
4. **Sector and industry risks** – specific risks associated with the sector or industry in which that supplier operates. *For example, cleaning (higher risk) vs professional services (lower risk).*

Eldercare’s broader due diligence processes that accompany the risk matrix assessment are outlined further in Criteria 4.

Operational risks

Eldercare solely operates in South Australia, with Australia being a low-risk country generally for modern slavery risk².

²In accordance with the Walk Free Foundations Global Slavery Index 2023.

Eldercare’s governance structures

Broadly, Eldercare has strong internal governance and leadership driving our operations (the specific details of our operations are outlined in Criteria 2). In terms of its modern slavery compliance structures, Eldercare’s Corporate Services Executive is responsible for oversight of Eldercare’s modern slavery compliance framework which then facilitates direct reporting to Eldercare’s Board. Eldercare’s Procurement and Contracts Manager continues to manage our modern slavery compliance framework and is supported by the procurement team to drive and develop our modern slavery compliance framework throughout the reporting period .

Our strong internal governance is supported by our comprehensive policy and procedure frameworks and our compliance with local laws and requirements. For example, Eldercare:

- pays all employees in accordance with Australian laws and requirements;
- has a variety of grievance mechanisms in place for reporting concerns or grievances. This includes a Whistleblower Policy which provides a grievance mechanism for eligible whistleblowers to report eligible disclosures;
- supports all employees through employee assistance frameworks; and
- has a robust employee training framework.

To support this, Eldercare undertakes specific employee training on modern slavery (which is discussed further in Criteria 4). Furthermore, modern slavery is regularly discussed in newsletters and briefings. Accordingly, Eldercare considers that it has a low risk of modern slavery occurring in its operations.

Labour hire risks

Eldercare is reliant on labour hire to fill staffing gaps so that we can provide services to our residents, which is very common practice in the aged care industry. The roles where labour hire is required includes nurses, personal carers, cleaners and hospitality staff.

Given the short-term nature of labour hire and the limited oversight that Eldercare has over the labour hire workers and the broader practices of the labour hire entities that it engages, there is an increased modern slavery risk associated with labour hire entities. Accordingly, Eldercare prioritises the training of employees to ensure that they understand the risk indicators of modern slavery which assists Eldercare in identifying potential modern slavery risks for its labour hire entities.

Given the increased risks with labour hire, Eldercare has undertaken site audits on labour hire suppliers during this reporting period, which is outlined further in Criteria 4.

Supply chain risks

Eldercare's most prevalent modern slavery risks are likely to be present in our supply chains, particularly deeper in our supply chains beyond our Tier 1 suppliers³.

In terms of how Eldercare manages its suppliers, Eldercare has a centralised procurement function which allows for robust oversight over our business-wide procurement and contracting. Having centralised procurement means that Eldercare directly works with suppliers to identify risks early in the supplier engagement process. Furthermore, centralised procurement allows us to have control and set our business standards directly to our suppliers.

³Our Tier 1 suppliers are the suppliers that Eldercare directly engages and has contractual relationships with.

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Eldercare has assessed that the following categories of suppliers are where modern slavery risks are heightened:

Sector	Risk
 <p>COTTON/LINEN</p>	<p>Cotton is a key raw material that is used to fulfill Eldercare's services. As an aged care provider, Eldercare relies on various types of linen such as uniforms, bedding and towels.</p> <p>Cotton is a high-risk commodity for modern slavery.</p> <p>Eldercare continues to implement steps to identify and mitigate the risk associated with cotton and linen supply chains and gain oversight and visibility over these high-risk supply chains.</p> <p>Risk for Eldercare: directly linked</p>
 <p>CONSUMABLES</p>	<p>Specific food consumables have been identified as higher risk consumables, for instance, fruit, rice, cocoa and coffee.</p> <p>Eldercare has a "buy local" policy. Whilst Eldercare engages local wholesalers, Eldercare is seeking increased oversight over where the wholesaler is sourcing produce. Risk can be heightened where wholesalers change supply chains without notifying Eldercare. Furthermore, given our obligations to respect our clients' purchasing choices, sometimes consumables are purchased from higher risk jurisdictions to comply with our clients' purchasing choices.</p> <p>During this reporting period, Eldercare has undertaken a:</p> <ul style="list-style-type: none"> • specific review of its fruit and vegetables suppliers; and • site audit of one of its key food suppliers as part of the tender process. <p>These steps are outlined further in Criteria 4 below.</p> <p>Risk for Eldercare: directly linked</p>

Sector

Risk



PERSONAL
PROTECTIVE
EQUIPMENT (“PPE”)
AND MEDICAL
EQUIPMENT

PPE is a sector that contains heightened modern slavery risks which have been increasingly prevalent since the supply chain strains caused by the COVID-19 pandemic.

This is a risk that Eldercare continues to monitor closely and considers this as an ongoing risk factor.

Risk for Eldercare: directly linked



MEDICAL
CONSUMABLES

Eldercare relies heavily on medical consumables as an entity operating in the aged care sector. Particular medical consumables carry heightened modern slavery risks based on the location of the overseas manufacturing facilities.

Furthermore, the supply chains of medical consumables are complex and opaque, with many tiers involved in these supply chains (for example, active ingredients suppliers, processing and manufacturing suppliers, packing suppliers). This complexity makes visibility over the entities within these supply chains difficult.

Risk for Eldercare: directly linked

Sector



CLEANING

Risk

The cleaning industry has always carried heightened modern slavery risks because of specific risk factors pertinent in this industry, such as the volume of migrant workers in the industry and the prevalence of deceptive recruiting practices (for example, debt bondage).

This is a risk that Eldercare continues to monitor closely and considers this as an ongoing risk factor. During this reporting period, Eldercare has undertaken site audits on selected labour hire suppliers which is outlined further in Criteria 4 below.

[Risk for Eldercare: directly linked](#)

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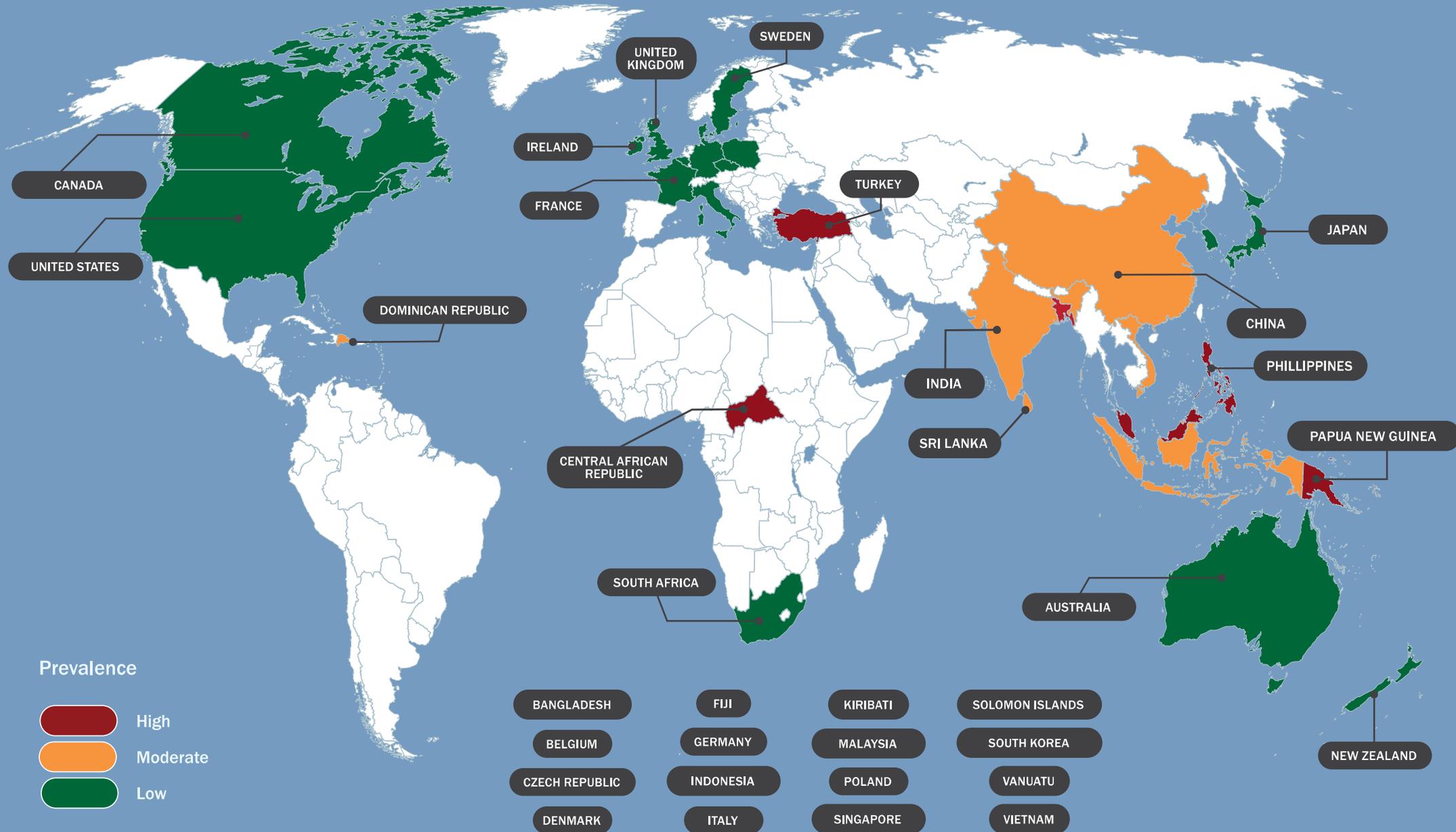
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Modern Slavery Risk

This map demonstrates prevalence of modern slavery (in accordance with the Global Slavery Index) in our supply chains. This includes prevalence deeper in Eldercare's supply chains capturing tier 2 and raw material locations.



Actions taken to address modern slavery risk

Using the deep knowledge that we have obtained over the last reporting periods, the key focus of the actions undertaken during this reporting period has been to conduct deep dive due diligence on suppliers through undertaking site audits.

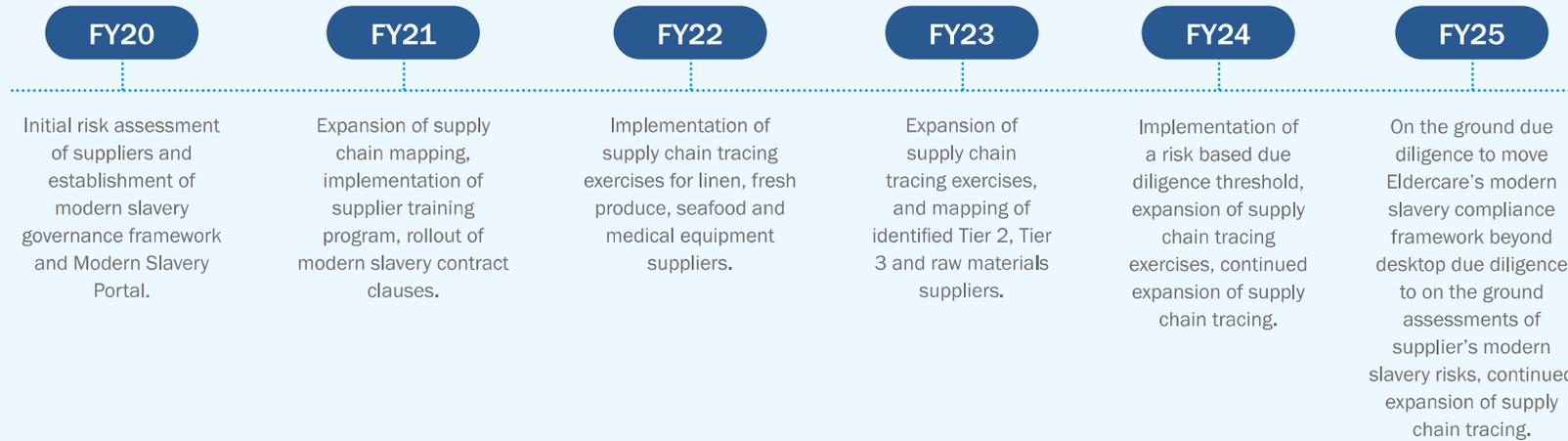
A summary of the key action items undertaken by Eldercare in this reporting period is as follows:



Eldercare continues to engage third-party advisors who assist us in maintaining our modern slavery compliance framework and rolling out action items in each reporting period. This helps us ensure that we are meeting the continuous improvement approach underlying the Act.

The Evolution of Eldercare's Supply Chain Due Diligence

The diagram below showcases how Eldercare has matured its approach to supply chain due diligence over the six (6) reporting periods that it has been reporting under the Act.



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Supplier due diligence processes

Eldercare’s supplier due diligence is conducted via our Modern Slavery Portal (“Portal”) which streamlines our supplier management and due diligence processes through the automation of due diligence and our suppliers overarching risk score.

The due diligence procedures which are undertaken via the Portal are as follows.

Risk matrix assessment

Eldercare utilises a risk matrix which has been developed using data from the Global Slavery Index and the guidance and principles from the ten (10) principles of the United Nations Global Compact (UNGC), the Universal Declaration of Human Rights, and the Guidance for Reporting Entities which has been issued by the Australian Government to assist organisations complying with the requirements of the Act.

Our risk matrix utilises risk factors which are outlined further in Criteria 3 above.

During the reporting period, Eldercare undertook risk matrixing on all Tier 1 suppliers and:

- 245 Tier 2 suppliers
- 1 Tier 3 supplier

Risk screenings

All new suppliers are screened through a risk and compliance tool called Refinitiv. This assesses suppliers for risk across broader environmental, social and governance (ESG) risk factors such as:

- Integrity risks - for example, bribery and corruption.
- Human rights risks – modern slavery, broader employment related issues;
- Environmental risks.
- Data and cyber risks.
- Operational and quality risks.
- Identity risks – for example, transparency risks.
- Financial risks.

Risk screenings provide an important function to allow us to issue spot potential issues. It may also be that a screening result changes the risk profile of a supplier as we consider broader ESG risks as risk indicators for modern slavery risk.

During the reporting period, we undertook 708 risk screenings across our Tier 1, Tier 2, Tier 3 and raw materials suppliers. This includes all new suppliers engaged during the reporting period as well as existing suppliers as part of our refresher due diligence process which is outlined further below.

Questionnaires

All suppliers who are assessed as high or moderate risk under the risk matrixing and screening processes are issued with modern slavery questionnaires via the Portal.

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The Portal scores the results of the modern slavery questionnaire using a traffic light system. Green means low risk; orange means moderate risk and red means high-risk.



Eldercare has continued to undertake supply chain tracing exercises on specific high risk supply chains which involves the issuing of a supply chain tracing questionnaire, the details of which are outlined in more detail below.

Refresher due diligence

All suppliers are subject to annual refresher due diligence. Supplier are risk screened and risk matrixed annually. Eldercare monitors any changes in the risk profiles of its suppliers in the Portal.

Where there is a change in a supplier's risk profile, Eldercare undertakes steps to assess the reasons for, and the implications of, this change. For example, if a supplier responds to a modern slavery questionnaire with a response which indicates that their modern slavery risk profile is higher than in the previous reporting period, Eldercare may undertake steps such as, for example, issuing correspondence to the supplier via the Portal asking for more information on the change in their questionnaire answer.

Conducting site audits

As outlined in Criteria 3, labour hire is a key operational modern slavery risk for Eldercare. Labour hire has recently been a focus area of the NSW Anti-Slavery Commissioner. For example, the NSW Anti-Slavery Commissioner has highlighted labour hire as a focus area for their agenda which has resulted in a parliamentary enquiry into the risks of modern slavery for temporary migrant workers in regional and rural NSW being launched⁴.

Eldercare has moved to focusing on site audits during this reporting period as part of the next evolution of its modern slavery compliance framework. Eldercare identified during the reporting period that it has largely undertaken desktop due diligence to identify modern slavery risks thus far. Whilst this has been an effective method of scoping out our modern slavery risks, on the ground due diligence is required to move our due diligence beyond assessing inherent modern slavery risk to assessing actual modern slavery risks.

Accordingly, Eldercare conducted site audits on four (4) high risk suppliers. Three (3) of these suppliers provide labour hire to Eldercare and one (1) of these suppliers provides food to Eldercare and was audited as part of Eldercare's tender processes. Eldercare conducted these site audits by sending out a member of its procurement team to the offices of its suppliers and through observing labour hire workers on the ground at Eldercare.

Eldercare's third-party advisors assisted Eldercare in developing the audit criteria and train the relevant Eldercare employee undertaking the site audit on key risks and indicators to look out for when conducting the site audits.

⁴A report issued by the Office of the Anti-Slavery Commissioner recommended a parliamentary enquiry into temporary migrant workers in regional and rural NSW. The report is available here: https://dcj.nsw.gov.au/documents/legal-and-justice/anti-slavery-commissioner/plans-and-discussion-papers/Be_Our_Guests_-_Addressing_urgent_modern_slavery_risks_for_temporary_migrant_workers_in_rural_and_regional_New_South_Wales.pdf

The site audit process has resulted in Eldercare increasing its oversight over the practices and modern slavery risks associated with these suppliers. As outlined in Case Study 1 below, some non-compliances were identified during the reporting period which Eldercare would not have been aware of but for this site audit process.

Case Study 1 - Non-compliances and remediation

During the reporting period, Eldercare conducted a site audit on a supplier that provides nursing labour hire. During the site audit, it was identified that the supplier had the following non-compliances:

Non-Compliance	Outcome
Breaches of aged care screening requirements.	This has since been rectified.
The accounts payable system that the supplier utilised did not have features built into the system to limit staff working consecutive days, meaning that overtime was a key risk factor for the supplier.	Upon a review of timesheets, there was no evidence of excessive hours being worked. However, given the lack of checks and balances surrounding the hours worked, this could create a culture of employees not being able to say no to working overtime.

Eldercare conducted a subsequent audit one (1) month later to ensure that the above non-compliances had continued to be rectified. Eldercare will be conducting a further audit in the next reporting period to ensure that the non-compliances continue to be rectified.



Case Study 2 - Tier 2 suppliers identified through Tier 2 Tracing Project

During the reporting period, a supplier that we engage to provide us with chemicals answered the supply chain tracing questionnaire which was issued to the supplier in the FY24 reporting period.

The supplier provided us with the details of three (3) suppliers that it utilises to provide Eldercare with goods, one of which is based in Italy. We have been able to conduct risk matrixing and risk screenings on these suppliers which are reflected in the supplier risk and location maps outlined above.

Eldercare will continue to monitor this supply chain and conduct further due diligence to continue to dive deeper into this supply chain, including utilising its Chemical Safety Sheet Register as outlined above.

Supply chain tracing and identification of Tier 2 suppliers

Eldercare undertakes supply chain tracing exercises on key high risk supply chains to enable Eldercare to gain visibility of the modern slavery risks throughout these supply chains.

Building on supply chain tracing efforts in previous reporting periods, we issued one (1) supplier with a supply chain tracing questionnaire during the reporting period. We selected this supplier as this supplier provides us with medical equipment which is a high-risk supply chain for modern slavery. Eldercare has issued 18 suppliers with supply chain tracing questionnaires thus far.

We have taken additional actions to obtain the details of our Tier 2 suppliers. For example, during the reporting period, we have developed a Chemical Safety Sheet Register to capture the Tier 2 chemical supplier data from the chemical safety sheets that we receive to enable us to conduct due diligence on these suppliers via the Portal. These chemical suppliers are the suppliers of the wholesalers that we engage directly.

We had identified that we were receiving information about our Tier 2 chemicals suppliers as part of business-as-usual processes, but we were not capturing this data for our modern slavery compliance. The development of this Chemical Safety Sheet Register helps to fill this data gap and enables us to expand our oversight over our Tier 2 supply chains.

Eldercare considers its supply chain tracing efforts as a critical aspect of its modern slavery compliance framework. We will continue to expand our supply chain tracing efforts in future reporting periods.



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Case Study 3 - Site audit undertaken during tendering process

Eldercare undertook a site audit of one of its key food suppliers as part of the tender and re-negotiation of the supply contract with this supplier. In the last reporting period, Eldercare took a focus on evaluating the modern slavery risks associated with the food commodities that it purchases through its supply chain tracing exercises. During this reporting period, Eldercare has continued to prioritise undertaking deep dive due diligence into its food suppliers given the modern slavery risks associated with the food that it procures.

No non-compliances were identified during the site audit. Eldercare will continue to focus on the modern slavery risks of its food suppliers in accordance with its Ethical and Sustainable Sourcing Policy.

Ethical and Sustainable Sourcing Policy

Eldercare has implemented an Ethical and Sustainable Sourcing Policy which outlines the ESG factors that are considered by Eldercare during its procurement and tendering processes. This includes the consideration of modern slavery risk as well as the greenhouse gas emissions and sustainability implications of engaging certain suppliers.

For example, Eldercare specifically lists high risk food commodities and the locations from which they are sourced in the Ethical and Sustainable Sourcing Policy. Actions taken to assess high risk food commodities are outlined further in Case Study 3.

As outlined in the FY24 Modern Slavery Statement, Eldercare is undertaking a specific project to assess and measure its greenhouse gas emissions and has undertaken broader actions in the sustainability space. This Ethical and Sustainable Sourcing Policy documents how Eldercare considers ESG factors when engaging with new suppliers and renegotiates with existing suppliers which is critical to Eldercare's modern slavery compliance framework and broader sustainability initiatives.



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Development and rollout of ESG Training for suppliers

Eldercare developed and rolled out a training module which provides training to suppliers around Eldercare’s ESG priorities and the expectations that Eldercare has of its suppliers across its ESG priorities.

Eldercare issued this training to 6 suppliers. We selected suppliers to issue the ESG training to based on:

- the supplier’s overall modern slavery risk; and
- whether Eldercare had attempted to engage with the supplier as part of its supply chain tracing projects and broader sustainability initiatives and had struggled to obtain buy-in and engagement with the supplier.

A continued priority for Eldercare is the alignment of its modern slavery compliance framework and its broader ESG initiatives. Eldercare will continue to prioritise this alignment in future reporting periods.

Internal reviews of labour hire and fruit and vegetable suppliers

Review of labour, fruit and vegetables suppliers

Eldercare commenced a specific review of its labour, fruit and vegetables suppliers during the reporting period. One of the actions arising out of this review was the conducting of site audits on selected labour, fruit and vegetables suppliers which are outlined further above.

The review of the fruit and vegetables suppliers in particular was to ensure that Eldercare is procuring fruit and vegetables in accordance with its “Buy Local” policy which outlines Eldercare to sourcing local, Australian products over overseas equivalents. This is not only to support local, Australian suppliers, but to also minimise the modern slavery associated with sourcing certain food commodities.

Coming out of this review, Eldercare developed ESG questions to include in a tender pack for a new grain supplier, which is outlined further in Case Study 4 below.

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Case Study 4 - Development of ESG tender questions for grain supplier

During the reporting period, Eldercare went out to tender for a new grain supplier. Because of the work undertaken during the FY24 reporting period to identify high risk food commodities and implement this into Eldercare’s Ethical and Sustainable Sourcing Policy, Eldercare identified that grain was a high-risk commodity for modern slavery and that due diligence should be conducted in the tendering phase with any new suppliers sourcing this food commodity.

Eldercare asked the supplier a variety of ESG questions such as:

- Whether the supplier had a Modern Slavery Policy (or equivalent).
- Whether the supplier conducted due diligence on suppliers and in what format.
- If the supplier sourced from high-risk countries which Eldercare provided examples of in the questionnaire.

This process demonstrates how practically the Ethical and Sustainable Sourcing Policy is utilised in Eldercare’s procurement function and how Eldercare is proactively undertaking due diligence prior to engaging suppliers.

Continuation of modern slavery training for suppliers and employees

Employee training

Eldercare continues to train employees in management and employees who engage with suppliers and purchasing decisions on:

- what modern slavery is;
- risk factors and indicators of modern slavery; and
- the reporting requirements under the Act.

Supplier training

In addition to the ESG training issued to suppliers as outlined above, we also have an interactive modern slavery training module which is issued to suppliers via the Portal. This is issued to suppliers who, for example, have indicated a lack of understanding of their modern slavery risks through their answers to the modern slavery questionnaire.

Eldercare also engages with key suppliers on a regular basis via supplier meetings where modern slavery is a key agenda item to ensure that suppliers are continually reminded of how seriously we take our modern slavery compliance and our obligations as a reporting entity to identify and mitigate modern slavery risks within our operations and supply chains.

Education is critical to ensure that suppliers (particularly those that are high risk) understand what modern slavery is, what the risks are for modern slavery and what they can do to reduce these risks. Eldercare will continue to use and issue this training to suppliers and ensure that the training is updated with relevant legislative requirements and external guidance that is issued.



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Contractual reinforcement of supplier expectations

All supplier contracts, order terms and conditions and our contractor compliance systems contain a robust and detailed modern slavery clause. This clause:

- sets out our expectations with suppliers regarding modern slavery; and
- includes a requirement for our suppliers to report to us any instances of modern slavery in their organisation and supply chains.

All new contracts, agreements and terms and conditions are required to contain a modern slavery contract clause and all existing agreements are amended to include the modern slavery clause as they come up for renewal or extension.

Where it is assessed that the modern slavery risk associated with the relevant third-party is heightened, Eldercare may prepare or request a more robust, comprehensive modern slavery clause to be inserted into the relevant agreement.

Conducting maturity assessment of modern slavery compliance framework

Eldercare's third-party advisors prepared a maturity assessment framework which can be utilised to assess how reporting entities are performing against the:

- existing requirements under the Act; and
- potential new requirements which may be introduced under the Act from the statutory review of the Act in May 2023,
- within the context of best practice compliance in the industry.

Eldercare's third-party advisors also utilised the Walk Free Foundation's Benchmarking Tool to assist in conducting the maturity assessment.

Eldercare performed extremely well against the maturity assessment framework and has consistently benchmarked above the industry average in the Walk Free Foundations Benchmarking Tool over the last two (2) reporting periods. Through the maturity assessment process, we have identified action items to progress in the FY26 reporting period. Some of these action items are outlined further in Criteria 5 and 7 below.



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Assessing effectiveness of actions

The overarching purpose of the actions undertaken in this reporting period has been to utilise the deep knowledge that we have obtained over the last reporting periods to conduct deep dive diligence on our suppliers through site audits to assess the actual modern slavery risk of our suppliers.

The key driver for us undertaking site audits was from feedback from the Board suggesting that we need to move towards undertaking on the ground due diligence rather than relying on desktop forms of due diligence. This demonstrates the level of engagement from the Board in Eldercare's modern slavery compliance and broader ESG initiatives.

The site audits and other action items taken during the reporting period demonstrate the risk-based approach that is the foundation of our modern slavery compliance framework. We are proud of the improvements that we have made to our modern slavery compliance framework since our first reporting period.

As outlined above, Eldercare have conducted a maturity assessment of our modern slavery compliance framework. Because the criteria of the maturity assessment was developed to assess our progress against the requirements of the Act, the potential requirements of proposed amendments to the Act as well as broader best practice compliance, conducting this exercise has allowed us to review and reflect on our modern slavery compliance framework and prepare action items for the FY26 reporting period.

This is particularly important in light of recent announcements from the Attorney General's department who are running consultation sessions to discuss proposed amendments to the Act.

Our third-party advisors assist us in annually reviewing our modern slavery compliance framework and developing an action plan for each reporting period to ensure that we are meeting the continuous improvement approach underlying the Act. Accordingly, using the results of the maturity assessment, we have established an action plan for the FY26 reporting period. Some of the action items for the FY26 reporting period are outlined in Criteria 7 below.

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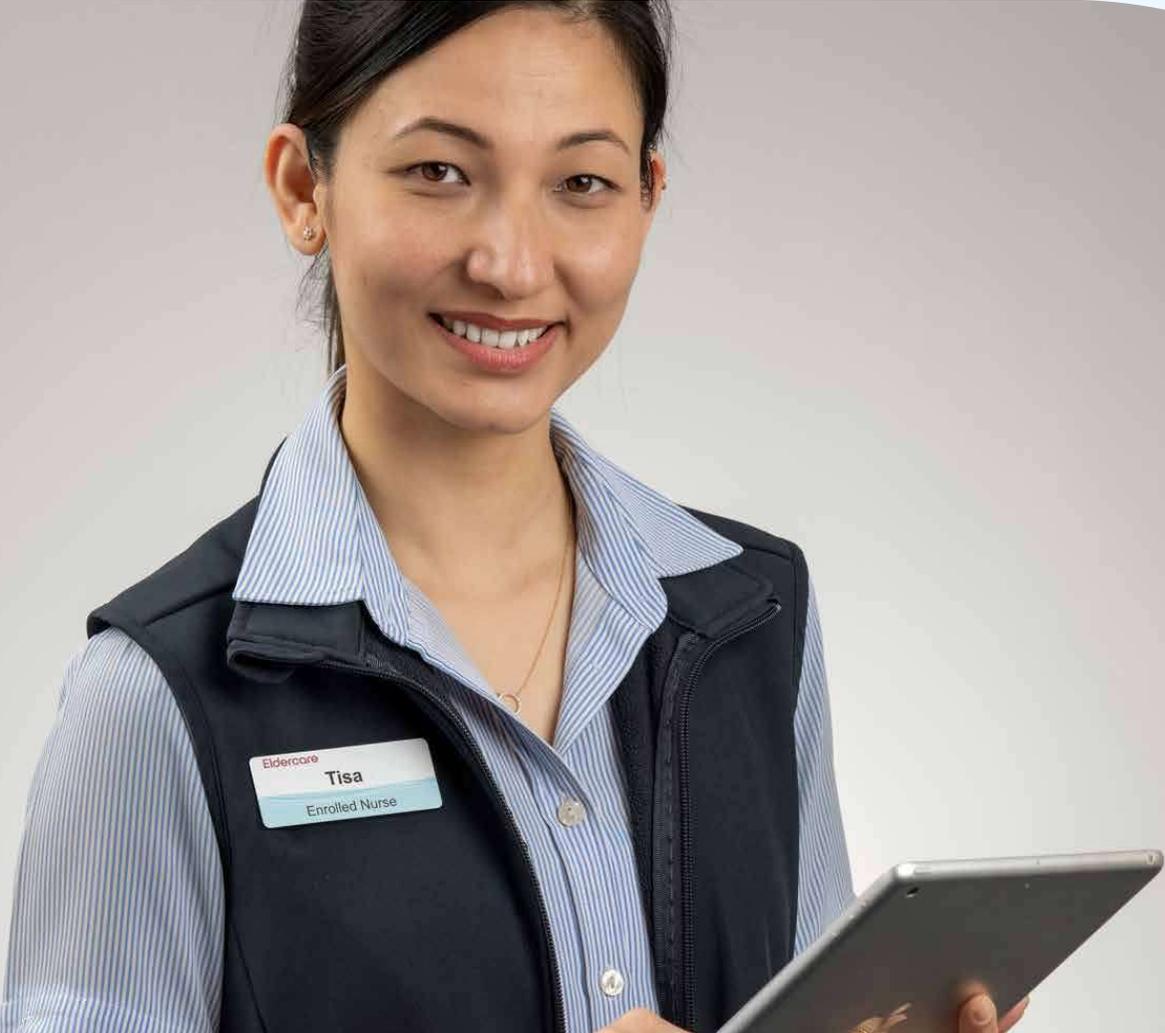
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This criterion is not relevant to Eldercare as Eldercare does not have any subsidiaries and does not own or control any other entities.



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Looking Forward

The focus of this reporting period has been to use the deep knowledge that we have obtained over the last reporting periods to conduct deep dive due diligence on suppliers through undertaking site audits to assess the actual modern slavery risks of our suppliers.

To continue this progress, we are looking to undertake the following action items during the FY26 reporting period:



The strides that Eldercare has undertaken during this reporting period demonstrates Eldercare's continual commitment to undertaking a progressive and pragmatic approach to our modern slavery compliance framework and our corporate governance more broadly, and our dedication to upholding our purpose of Respect, Accountability and Connection.

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Board approval

This is the sixth modern slavery statement for Eldercare Australia Ltd and represents the reporting period of 1 July 2024 to 30 June 2025.

Approved by the Eldercare Australia Ltd Board on 28 October 2025.

Jan Turbill
Chair

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