

Modern Slavery Statement



About Us

Benetas is a charitable organisation structured as a public company limited by guarantee, and does not own or control any other entity.

Benetas is a leading not-for-profit organisation engaging 1590 employees, with a mission to provide older Victorians, their families and carers with a full range of quality community based services, residential aged care homes, retirement living, primary and home care plus respite services, across metropolitan and regional Victoria. Benetas' main operations include its aged care and community health care services, including the people it directly employs.

Benetas' supply chain includes suppliers and contractors covering hospitality services (i.e. food services, catering, cleaning, laundry); allied health; agency labour; pharmacy & medical supplies; property services (i.e. maintenance, utilities, waste management, security, etc.); information, communication & technology; gardening; equipment purchases; capital & property development works, and investment advisers.

Modern Slavery Position

Benetas rejects any form of modern slavery and human trafficking, and we are committed to implementing effective systems and controls to ensure it does not take place directly within our own business or our supply chains. We respect the human rights of our employees, volunteers, customers, suppliers and business partners, and we aim to identify and manage any risks related to these rights.

Our Workplace Risk Assessment

Benetas engages employees that align with our values and we comply with all relevant local and national laws related to human rights and modern slavery in our workplace. As an organisation we have a strong focus on managing the health, safety and wellbeing of our employees and volunteers. We are committed to maintaining a diverse and inclusive workplace, treating people with respect and dignity, and have no tolerance for discrimination or harassment.

As an aged care service provider in a highly regulated industry, Benetas considers the risk of modern slavery within its direct business operations to be relatively low. However it recognises that through its supply chain, Benetas may be indirectly exposed to the risk of modern slavery and human trafficking.

Our Investment Funds Management Policy

Benetas' investment strategy covers environmental, social and ethical considerations when selecting suitable investment opportunities and explicitly states that companies who knowingly engage in, or are suspected of engaging in modern slavery through supply chain activities will not be considered.

Our Actions Taken

Benetas has commenced awareness training for employees to mitigate any potential human rights violations in our business operations and supply chains through:

- Governance - Benetas raises the awareness of modern slavery risks, informing the board and management of our obligations and accountabilities for identifying and managing these risks.
- Awareness Training – Human rights / modern slavery awareness training is undertaken by relevant managers involved in the procurement of goods and services within Benetas.
- Supplier Obligations – Benetas has a Supplier Code of Conduct which outlines Benetas' commitment to ethical, socially responsible and sustainable practices and makes it clear that we are committed to developing relationships with business partners, suppliers and contractors that align with our values and commitment to managing modern slavery risks. The Supplier Code of Conduct is issued to all new suppliers upon application to become a Benetas supplier.
- Supplier Selection – Tender documents now request that tenderers provide information on their approach

Modern Slavery Statement continued

to managing modern slavery in their supply chain. Supplier responses will influence the evaluation and final supplier selection. Updated standard supplier templates which includes our code of conduct, and contractor management to raise expectations of our commitment to managing modern slavery risks in our supply chains.

- Supplier Compliance – Benetas has implemented an online contractor compliance and induction system to manage contractor administration and compliance.
- Grievance and Feedback Mechanisms – Benetas has a Whistleblower Policy and complaints mechanism process that allows all Benetas directors, executives, managers, employees, volunteers, suppliers, contractors and consultants, the ability to raise concerns such as modern slavery risks in a confidential manner.

Impacts of COVID-19

Covid-19 continues to have an impact on the Benetas supply chain for Personal Protective Equipment (PPE) and we are aware of the increased risk of modern slavery that this demand has created.

To mitigate this risk, Benetas has aligned with reputable suppliers to source PPE and other impacted products. Our current suppliers still have challenges which limit their ability to conduct physical audits, however some products have been moved to manufacturing and supply in Australia such as gloves and hand sanitiser. Our suppliers know that Benetas does not support cheaper pricing where modern slavery is suspected.

What we are planning

Benetas intends to strengthen our understanding of human rights issues as they apply to our business operations and in particular our supply chains.

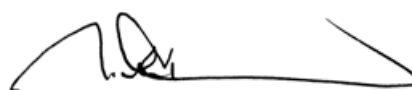
Our key areas of focus will be to:

- Continue to update relevant Benetas policies and procedures to specifically reference modern slavery risks and key accountabilities.

- Procurement Risk Assessment – Develop a risk-based assessment framework to identify supplier segments that potentially have higher risks of human rights violations within their supply chain. This will be used by relevant managers as a tool to educate and mitigate risk when engaging in supply arrangements that may expose Benetas to modern slavery practices.
- Work directly with suppliers identified as high risk categories for modern slavery, including linen and uniform suppliers, medical consumables, and catering services. The focus will be to investigate in more depth how far they have worked back into their own supply chains and their understanding of where their greatest exposure to modern slavery is in that supply chain and what they plan to do towards illuminating or reducing this exposure.
- Invest in an updated human rights / modern slavery awareness training module, to be completed by relevant managers involved in the procurement of goods and service within Benetas.
- Continue to develop key performance indicators in our contracts to measure the effectiveness in preventing modern slavery risks.

Statement

This statement was approved by the board of the Anglican Aged Care Services Group trading as Benetas (ABN 60 082 451 992) pursuant to section 13 of the Modern Slavery Act 2018 on 3 October 2022 and constitutes our modern slavery and human trafficking statement for the financial year ended 30 June 2022.



This statement is signed by Michael Urwin in his role as Chairman of Anglican Aged Care Services Group.

Michael Urwin
Chairman
October 2022