



Modern Slavery Statement

1 July 2023 – 30 June 2024



Helping Hand
new aged care

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Helping Hand provides services across many lands, traditionally owned by the Kaurna, Narungga, Ngadjuri, Nukunu, Barngarla, and Peramangk people. Helping Hand acknowledges the Traditional Owners of the land on which we work and provide services. We pay respect to their culture and heritage, and Elders past, present and emerging.

Introduction

Helping Hand Aged Care Incorporated (“Helping Hand”, “we”, “our”) is a not-for-profit aged care, home assistance, retirement living and residential care provider. Helping Hand has been serving the South Australian community for over 70 years and cares for over 7000 South Australians.

Helping Hand prioritises independence, choice, freedom and quality of care for our residents, employees, our community and other key stakeholders. This is guided by our core values of Excellence, Respect, Compassion and Community and our overarching vision of being the most trusted and exceptional partner in aged care and wellbeing services. This is underpinned by our mission to create communities and experiences to enable older people to live their best lives.

Ensuring that we have sustainable and ethical supply chains is a key priority for Helping Hand which coincides with our commitment to ensure that we achieve and continue to live out our core values and vision in everything that we do.

We do not tolerate any modern slavery practices within our supply chains or operations. In this reporting period, we have focused on expanding our supply chain tracing and due diligence efforts to gain greater oversight over our Tier 2 and Tier 3 suppliers and ensure that we are undertaking a proactive approach to our due diligence. We detail this within this modern slavery statement for the reporting period between 1 July 2023 to 30 June 2024, which is our fifth modern slavery statement since we began reporting in 2020.

In this reporting period, as well as continuing our ongoing due diligence, Helping Hand has focused on mitigating modern slavery risk and continuing to deepen our due diligence down our supply chains. A key aspect of this has been the testing of our new prospective due diligence framework.

We set this out in detail in this statement.

Criteria 1 – Reporting Entity

The reporting entity is Helping Hand Aged Care Incorporated (ABN 19 636 743 675). Helping Hand does not have any subsidiaries that it owns.

Criteria 2 – Structure, Operations and Supply Chains

Structure

Helping Hand operates solely in South Australia with our head office at 34 Molesworth Street, North Adelaide SA 5006.

Helping Hand is a not-for-profit incorporated association and is registered with the Australian Charities and Not-for-Profits Commission (ACNC). Helping Hand does not own or control any other entities.

As a not-for-profit incorporated association, Helping Hand is governed by a board of directors who oversee and evaluate our governance to ensure that we are performing to our highest level, meeting our clients' needs and acting in accordance with our core values and vision. Our executive team is responsible for our overall operations and help us deliver the best possible services for our clients.

We employ 2319 employees, of which 1540 are permanent and 779 are casual, as well as 182 volunteers across more than 20 locations and provide services to over 7,000 clients in their own homes and in ours. We prioritise engaging employees and volunteers with a diverse range of skills and training levels which is reflective of the diverse society that we serve and operate in.

Operations

At Helping Hand, we provide a range of aged care services across South Australia for our clients, which we summarise in the following categories:

Retirement living

Helping Hand has six (6) retirement living communities. We provide services to these communities such as maintenance and gardening services to the retirement living homes.

Residential Care

Eleven (11) of our operating locations offer services such as respite, personal care and nursing, meals, laundry, and cleaning.

Help at Home

We provide assistance to clients in their own homes across metropolitan Adelaide, the Eyre Peninsula, the Barossa Valley, the Mid North, Lower North, Whyalla, and York Peninsula.

Wellness

Helping Hand also provides wellness services to our clients such as allied health and nursing, social support, and exercise classes.

During the reporting period, on 21 July 2023, Helping Hand divested ownership of Barryne Retirement Village in Belair.



Our suppliers

Our suppliers are critical to our operations and assist us in carrying out the above services by either providing goods or services that:

- / are directly used in our client services; or
- / assist our workers in the provision of our client services.

We define our supply chains as follows:

- / Tier 1: the suppliers that we directly engage with and enter into contractual arrangements with.
- / Tier 2: the suppliers that our Tier 1 suppliers engage to supply Helping Hand with goods and services.
- / Tier 3: the suppliers that our Tier 2 suppliers engage to provide goods and services to the Tier 1 supplier.
- / Raw materials: the supplier that provides the raw materials that are used up the supply chain to provide goods to Helping Hand.

We acknowledge that in many instances there are further tiers in the supply chain than are depicted above due to the complexities of certain supply chains. For example, linen and cotton supply chains often involve Tier 4 and Tier 5 suppliers.

We endeavour to maintain long-term and stable relationships with our suppliers. We are proudly South Australian based and endeavour to use local suppliers where possible. However, this is not always possible, particularly if there have been supply chain disruptions, which have been experienced by organisations worldwide since the COVID-19 pandemic. In our regional areas, there may be limited alternatives for suppliers of certain goods and services because of goods and services availabilities in the area.

Helping Hand also operates in a complex industry that requires a diverse range of products and services which makes our supply chains equally complex. Accordingly, interstate, or international suppliers are required in certain circumstances.

FY24	FY23
1,054 Tier 1 Suppliers	825 Tier 1 Suppliers

There has been an increase in Tier 1 suppliers engaged by Helping Hand in this reporting period. This is largely due to the increase in the home care services and packages that we are offering to our clients, meaning that more suppliers are needing to be engaged to fulfill this demand. The redevelopment and upgrade to our facilities in North Adelaide and Whyalla, as well as the broader updates taking place to our information technology environment, has also seen growth in our supplier base in this reporting period.

Our supply chains

Helping Hand requires diverse suppliers to fulfill our services to our clients. We summarise our suppliers into eight broad categories:

Consumables



Administrative services



Professional services



Facility supplier



Electronics



Apparel and laundry



Labour services



Medical

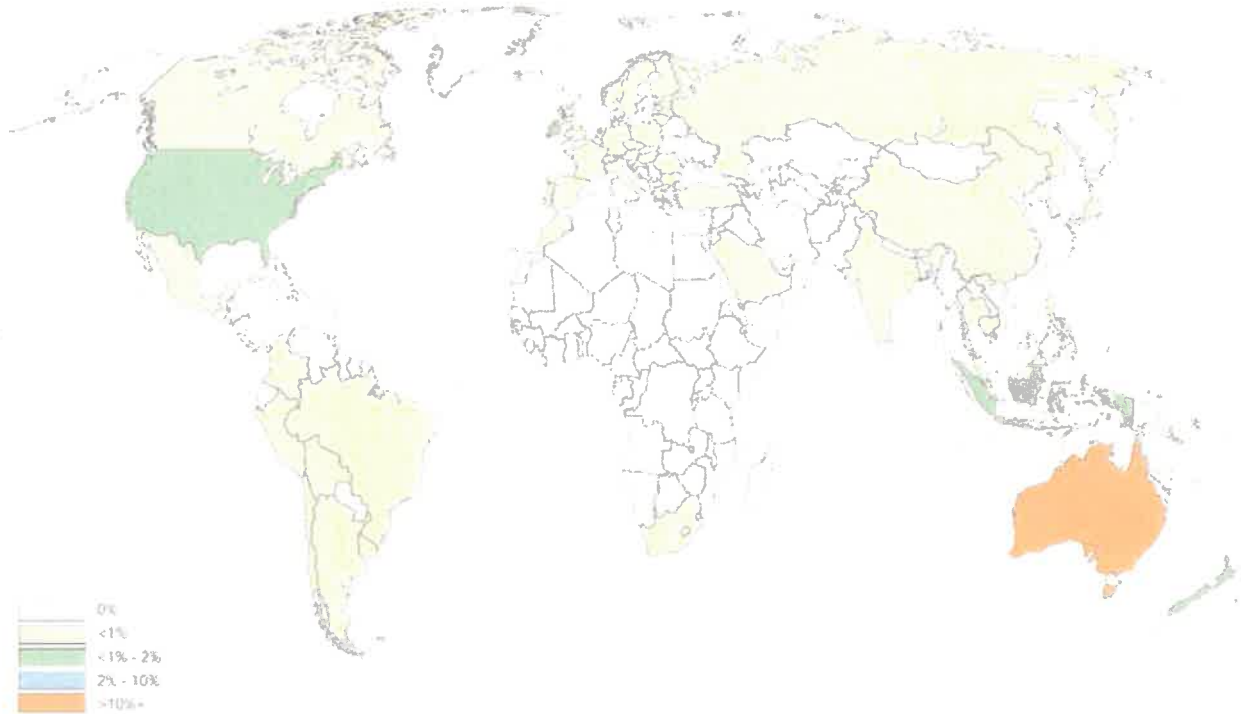


Where are our suppliers based?

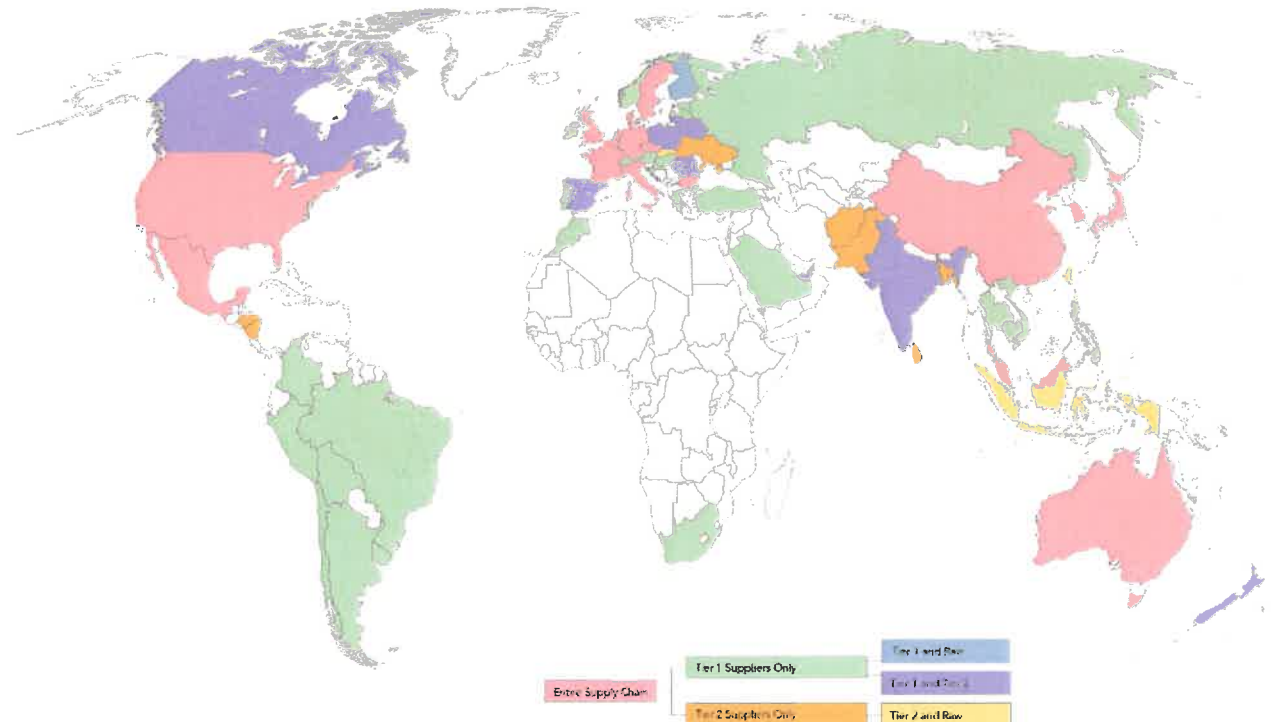
Helping Hand’s Tier 1 suppliers are primarily based in Australia with some of these suppliers operating globally.

As shown in our supply chain map below, as you delve deeper into our supply chains down to raw material level, our supply chain becomes very global and diverse, with various tiers of suppliers based on most continents of the earth.

Helping Hand Tier 1 suppliers



Helping Hand Tier 2, 3 and beyond suppliers



Criteria 3 – Risks of Modern Slavery

Assessing modern slavery risks in our operations and supply chains is a continual undertaking which Helping Hand develops and improves upon in each reporting period in response to changes in risk and the improvement of risk methodologies.

Helping Hand undertakes its modern slavery risk assessments in accordance with the UN Guiding Principles (“UNGP’s”). The UNGP’s are a set of guidelines for entities to use to prevent, address and remedy human rights abuses committed in business operations and supply chains.

A fundamental aspect of the UNGP’s is the “cause, contribute to or directly linked to” model which is used to assess the risks of modern slavery and the appropriate course of remedy when an entity either causes, contributes to, or is directly linked to the risk or instance of modern slavery. This approach is built into the core of Helping Hand’s modern slavery compliance framework.

Examples of situations where an entity might cause, contribute to, or be directly linked to modern slavery is shown in the table below:

Cause	Modern slavery that an entity causes itself via its activities or omissions results in harm. <i>Example – a supplier that uses forced labour in its operations.</i>
Contribute to	Activities or omissions to facilitate, enable or incentivise harm. <i>Example – engaging a supplier that is unusually low-cost compared to other competitors in the industry which requires the use of child labour.</i>
Directly linked to	Being linked to harm through products, services, or business relationships <i>Example – engaging a supplier that is later found to exploit workers.</i>

How do we assess risk?

Helping Hand utilises a risk matrix which is used as the first step in assessing the modern slavery risk of a supplier. This risk matrix process assesses suppliers against risk factors based on their sector / industry, product and services, geographic / jurisdictional risk and entity specific risks and is one part of our multi-factorial approach to due diligence.

Sector and industry risks

For example, manufacturing plant (higher risk) vs professional services firm (lower risk)

Product and services risks

For example, cleaning services (higher risk) vs professional consulting services (lower risk)

Geographic risks

For example, China (higher risk), and particularly the Xinjiang Uyghur Autonomous Region vs Netherlands (lower risk)

Entity risks

For example, a small factory (higher risk) vs a national business (lower risk)

Our risk matrix has been developed using sources such as the Global Slavery Index, the ten principles of the UN Global Compact, the Universal Declaration of Human Rights and the Modern Slavery Act Guidance for Reporting Entities. Most recently, we have updated the risk matrix to align with the jurisdiction and industry risks provided in the NSW Government Procurement Guidance to ensure that Helping Hand's approach to risk assessment is aligned with local resources and guidance. The risk matrix is part of our multi-faceted due diligence framework which is detailed in Criteria 4 below.

Operational risks

Helping Hand considers that we have a low risk of modern slavery occurring within our own operations (details of our operations are outlined in detail in Criteria 2 above). Helping Hand has strong internal governance structures, supporting our risk profiling of our operations.

A key feature of our internal governance structures are our frameworks. This includes an easily accessible grievance mechanism through the form of our Whistleblower Policy which is available to all employees, contractors and other "eligible whistleblowers" that work with, and for, Helping Hand. Furthermore, we have other grievance mechanisms for personal employment related grievances such as our *Workplace Grievance Resolution Procedure*.

Our procurement department, including our procurement manager, are the contact points for employees to report any modern slavery instances and broader notifications, questions or concerns to, which our employees are aware of through our employee modern slavery training and our modern slavery policy.

Additionally, Helping Hand operates within the aged care industry which is a highly regulated industry with ongoing reporting and disclosure obligations. For example, Helping Hand has ongoing reporting obligations when there are specific changes to key personnel. More broadly we adhere to legislative and regulatory requirements which are underpinned by our strong governance structures and policies which uphold protections related to workplace rights, freedom of association and freedom from workplace discrimination.

Accordingly, we maintain the position that the risk of modern slavery occurring within our own operations is low. However, in accordance with our ongoing due diligence approach, we will continue to re-evaluate this risk and ensure that actions are undertaken to keep our assessment as low.

Helping Hand's key supply chain risks

The key supply chain categories where Helping Hand has identified that there are heightened modern slavery risks are as follows:

Category	Cause, contribute to, directly linked to Helping Hand	Why is this a risk for Helping Hand?
Consumables (food and beverages, catering and non-perishables)	Directly linked	<p>Specific supply chain risks exist with fish and rice which is utilised in providing our services to our residents.</p> <p>Helping Hand continues to monitor these specific supply chains and undertake further investigations around the practices of catching and harvesting fish and rice respectively.</p>
Medical suppliers (PPE and medical equipment)	Directly linked	<p>Face masks, single use gloves and gowns and face shields and other PPE have heightened risks of modern slavery, particularly from countries such as Malaysia.</p> <p>Further, the equipment and materials that makes up most medical equipment is manufactured overseas. These overseas jurisdictions heighten the modern slavery risks of these supply chains.</p>
Cleaning and waste disposal	Directly linked	<p>The cleaning and waste disposal industry employs a large number of temporary workers in roles which often have "low skill" requirements. This means that these roles are attractive to migrant workers and low skill workers with limited English who are often financially vulnerable and needing support, meaning that they are more susceptible to modern slavery practices.</p> <p>Helping Hand continues to question suppliers about their employees and whether they use migrant or overseas workers to ascertain whether that particular supplier carries heightened modern slavery risks which are associated with the use of migrant or overseas workers.</p> <p>Where available, Helping Hand endeavours to engage national, reputable cleaning and waste disposal suppliers to mitigate some of the risk associated with this industry.</p>

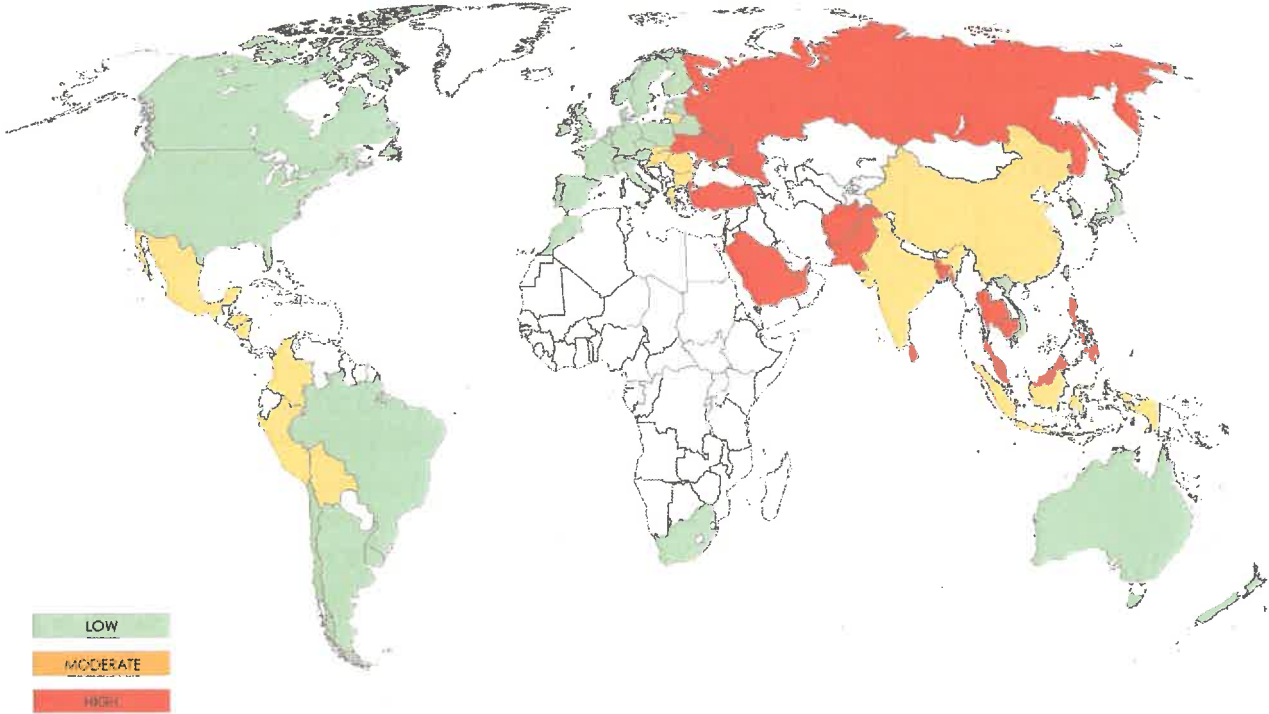
Case study: linen and cotton suppliers

Helping Hand continues to closely monitor its supply chains for any links to the Xinjiang Uyghur Autonomous Region in China (“Xinjiang”). This includes monitoring the sourcing of goods and services from China, as well as monitoring specific supply chains where there are heightened risks, such as suppliers who supply goods such as cotton / linen, tomatoes and polysilicon. Xinjiang has been linked to forced labour camps with Uyghur people and other minority groups.

Helping Hand considers that the risks associated with goods sourced from Xinjiang include being “directly linked” to modern slavery (in particular, forced labour) practices by unknowingly engaging suppliers who engage in modern slavery practices. This is particularly prevalent for our linen suppliers who source raw cotton to be manufactured into goods which Helping Hand obtains to provide its services to its residents.

In response to this ongoing risk, Helping Hand has expanded its due diligence procedures by identifying at-risk suppliers and have undertaken specific due diligence and supply chain tracing exercises on these suppliers. The steps undertaken in this reporting period to mitigate this risk so far are detailed in Criteria 4, however Helping Hand acknowledges that the mitigation of this specific risk is an ongoing priority.

Supply chain risk map



Criteria 4: Actions to Address Modern Slavery

In this reporting period, Helping Hand continued to undertake actions to address the risks of modern slavery in our supply chains and operations whilst significantly reforming and expanding their modern slavery compliance framework.

Summary of actions taken in this reporting period

<p>Guidance and systems</p> <p>Continued to engage a third party to provide guidance.</p> <p>Continued to utilise technology with our modern slavery compliance portal (MS Portal).</p> <p>Prepared and utilised an annual action plan to progress our modern slavery compliance.</p>	<p>Governance and oversight</p> <p>Continued oversight by Modern Slavery Project Leader.</p> <p>Broader oversight by a nominated member of executive.</p> <p>Implemented updated Modern Slavery Policy alongside the updated Supplier Code of Conduct that was updated in FY23.</p> <p>Developed a template Ethical Procurement Policy which is currently undergoing internal review to be considered for implementation.</p> <p>Consideration of a new KPI Framework.</p>
<p>Modern Slavery Questionnaires</p> <p>Updated modern slavery questionnaire.</p> <p>Continued issuing refresher questionnaires to Tier 1 suppliers.</p>	<p>Training</p> <p>Review of employee modern slavery training in conjunction with rollout of the prospective due diligence workflow.</p>
<p>Procurement and Contracting</p> <p>Conducting testing and internal review of our new procurement framework prior to implementation with all suppliers.</p> <p>Continued implementation of a prospective due diligence process using our MS Portal.</p> <p>Monitoring of contracts with suppliers focused on modern slavery clauses.</p>	<p>Supply chain mapping and due diligence</p> <p>Undertook risk screenings and risk matrixing of all Tier 2 and Tier 3 suppliers identified in FY23.</p> <p>Following results of questionnaires provided to Tier 1 suppliers, issued questionnaires to the identified Tier 2 and Tier 3 suppliers.</p> <p>Issued supply chain tracing questionnaires to 44 Tier 1 suppliers to provide us with the details of their Tier 2 suppliers.</p> <p>Continued use of risk matrix whilst undertaking procurement review, revised risk matrix to align with the Procurement Guidance provided by the NSW Government.</p>

Guidance and systems

We continue to engage a third-party advisor who assists us with the management and development of our modern slavery compliance framework. Our third-party advisor oversees the process of preparing and implementing an action plan for each reporting period which sets out our goals and action items for the reporting period.

Through our third-party advisor, we have continued utilising the MS Portal which assists us in undertaking due diligence on our suppliers, mapping our supply chains and otherwise managing our suppliers.

The MS Portal automates our modern slavery compliance framework through automated risk assessments and notifications. It also allows us to communicate directly with our clients, have visibility of when a supplier has opened correspondence or started an action item (for example, started a questionnaire that we have issued to the supplier) and gives us the ability to produce reports and data analytics to manage our supply chain information.

New suppliers

Through the MS Portal, new suppliers undergo the following due diligence process. We note that currently, suppliers undergo this process once they have been engaged by Helping Hand, however we are working towards implementing a prospective due diligence framework whereby this occurs prior to engaging the suppliers. This is detailed further below:

- ✓ **Screenings:** all new suppliers undergo independent due diligence screening through Refinitiv. These independent screenings integrate a further layer of risk management into Helping Hand's due diligence which assesses risk beyond modern slavery risk (i.e., other environmental, social and governance (ESG) factors). We screen our suppliers for:
 - Integrity risks (e.g., bribery and corruption)
 - Environmental, Social and Governance Risks (e.g., modern slavery, environmental degradation, and regulatory enforcement).
 - Data and cyber risks (i.e., data security).
 - Operational and quality risks (i.e., product and service quality).
 - Identity risks (i.e., transparency).
 - Financial risks (i.e., financial irregularities).
- ✓ **Risk matrix assessments:** the MS Portal automatically provides a risk assessment of our suppliers based on a combination of location factors, industry factors and predicted annual spend on the supplier. Our risk matrix is described in more detail above.
- ✓ **Questionnaires:** the MS Portal automates the distribution and collation of supplier questionnaires so that we can ascertain the suppliers' current risk profile for modern slavery and other key risk factors (for example, whether the supplier undertakes due diligence on their suppliers).

These questionnaires are tailored so that Helping Hand can track expectations through specific supply chains. For example, because of the heightened risks associated with our linen suppliers, we have issued tailored questionnaires to these suppliers which asks specific questions around the suppliers that they source their cotton from and where these suppliers are located.

Furthermore, as Helping Hand is prioritising supply chain tracing exercises, we have been able to issue tailored questionnaires to our Tier 1, 2 and 3 suppliers which enables

us to identify entities further down our supply chains and assess their modern slavery risk profiles.

The results of our questionnaires are automatically scored by the MS Portal using a “traffic light system”. This traffic light system grades the results as either:

- Green = low risk
- Orange = moderate risk
- Red = high risk

The risk ratings from screenings, the risk matrix assessment and the questionnaires are outlined separately within the MS Portal. The MS Portal then calculates the average risk rating based on all of the risk assessments available on the MS Portal and applies that average as the risk rating for that supplier.

If there are significant risks or non-compliances identified throughout the due diligence processes described above, Helping Hand takes additional steps to identify and remediate the risks or non-compliances identified.

Depending on the supplier, the non-compliances identified, and the severity of the non-compliances identified, Helping Hand undertakes steps such as issuing:

- communications to suppliers asking them to clarify an answer to a questionnaire and whether a non-compliance identified has been remediated; and / or
- tailored questions to the supplier based on the risks identified (for example, if a supplier has specific risks associated with the supply of linen and cotton, Helping Hand would issue a specific questionnaire to the supplier tailored to assessing this risk); and / or
- issuing modern slavery training to the supplier – modern slavery training is generally issued to suppliers if Helping Hand is not satisfied that the supplier understands and is assessing their modern slavery risk.

Case study: communicating and working collaboratively with our suppliers

Helping Hand issued a questionnaire to a supplier that was identified as a moderate risk supplier through the screening and risk matrixing process. In the questionnaire, the supplier indicated that they had identified bribery and corruption within their organisation. Whilst this is not an instance of modern slavery or broader labour and human rights breaches, instances of bribery and corruption and other ESG risks raise the risk profile of the supplier.

We issued communications to this supplier asking them to clarify if and how this incident was remediated. The supplier’s response satisfied Helping Hand that they had implemented adequate processes and procedures in place to mitigate this incident and the associated heightened risk.

Existing suppliers

Helping Hand continues to maintain an ongoing due diligence approach. This means that after suppliers are initially assessed for modern slavery risk, they are re-assessed for their modern slavery risk annually to assess if their risk profile has changed (for better or for worse). Accordingly, their risk rating is continually updated and refreshed. We also continually review and update our risk assessment process with updated risk data and methodology. For example, when data from the Walk Free Foundation’s Global Slavery Index is updated, our risk matrix is updated with this data.

A part of this ongoing due diligence is the issue of “refresher questions” annually to suppliers. This asks suppliers to review their previous answers to questionnaires issued and provide any updates to these answers based on any changing circumstances. Alongside these refresher questions, Helping Hand can issue further, tailored questions to seek out specific information required.

This year, we have updated the refresher questionnaire with additional questions which ask the suppliers to provide details about the due diligence processes that they have to monitor the modern slavery risks within their suppliers (Helping Hand’s Tier 2 suppliers).

As part of this, we have also added descriptions into the refresher questionnaires defining what high, moderate and low risk suppliers are to ensure that our suppliers are educated on what these terms mean, ensuring that the suppliers can answer our questionnaires as accurately as possible.

The MS Portal gives us automatic reminders when this due diligence should be refreshed on suppliers and updates the supplier risk score when the refresher questionnaires have been completed. The MS Portal also automatically sends reminders to the suppliers to complete this questionnaire at scheduled intervals before and after the due date of the questionnaire (if the questionnaire is not already completed by the supplier as at the due date).

Governance and oversight

Our modern slavery governance structures

Helping Hand’s Modern Slavery Project Leader continues to have ultimate oversight over Helping Hand’s modern slavery compliance framework.

The Modern Slavery Project Leader then reports to a member of our Executive who is responsible for and has general oversight over Helping Hand’s modern slavery compliance.

Policies and Codes

Helping Hand undertook substantial review and developed changes to its Modern Slavery Policy. Those changes were implemented during this reporting period and implemented amendments to ensure that our due diligence procedures are adequately reflected in the Modern Slavery Policy.

As a result of the review that took place in FY23, we also developed and reviewed changes to our Supplier Code of Conduct which were implemented in this reporting period.

We have now fully implemented the updated Supplier Code of Conduct, which was distributed to suppliers through our MS Portal and accepted at the beginning of this reporting period.

Through the MS Portal, suppliers are required to:

- ✓ read the updated Supplier Code of Conduct;
- ✓ declare that they have read the updated Supplier Code of Conduct; and
- ✓ declare that they agree to comply with the updated Supplier Code of Conduct,

as part of the automated issuing of questionnaires through the MS Portal.

Proposed Ethical Procurement Policy

In the last reporting period, we outlined that Helping Hand was considering implementing an Ethical Procurement Policy. In this reporting period, our third-party advisors provided us with a model Ethical Procurement Policy to consider. The Ethical Procurement Policy, if implemented, would sit within our policy suite and act alongside our Supplier Code of Conduct and our Modern Slavery Policy.

The aim of an Ethical Procurement Policy is to prescribe specific procurement rules and guidelines for purchasing decisions which are focused modern slavery and human rights.

Helping Hand is considering how an Ethical Procurement Policy will fit within our existing policy suite and how this policy would reflect its purchasing decisions. As we have taken significant steps in this reporting period towards implementing a prospective due diligence framework, Helping Hand will revisit the implementation of an Ethical Procurement Policy once this prospective due diligence framework is in place across Helping Hand's entire supplier base, upon which Helping Hand can focus on introducing an Ethical Procurement Policy which reflects Helping Hand's purchasing goals and decisions.

Consideration of KPI Framework

Our third-party advisors have prepared and developed a draft KPI Framework. We are working through what Helping Hand's goals and priorities are for our modern slavery compliance to enable us to continuously improve our modern slavery compliance year on year. We will continue to work with our third-party advisors to get this KPI Framework into its final form. The KPI Framework will then act as an overarching action plan to guide our modern slavery compliance framework going forward in addition to the commitments made for FY25 in this statement.

Modern Slavery Questionnaires

When Helping Hand engages a new supplier, they are assessed through independent screenings and assessed against our risk matrix and, depending on their risk and spend profile, are issued with questionnaires, the scores of which culminate in an overall risk profile for the supplier. Our current due diligence framework is outlined in further detail below.

Existing suppliers are issued with refresher questionnaires annually to ensure that their risk profile is regularly updated. Existing suppliers are annually screened and risk profiled against our risk matrix to monitor any changes in risk.

Risk profiles can be impacted by many factors, including changes due to external events. For example, events such as the war in Ukraine, COVID-19 and the global scrutiny of forced labour camps in Xinjiang, China. When external events like this occur, Helping Hand takes targeted action to address these heightened risks by issuing further due diligence to specific supply chains.

Ongoing communications with existing Tier 1 suppliers

We are continuing to issue remediation communications and plans (where necessary) to our suppliers where specific modern slavery risks have been identified through the questionnaire process.

As discussed above, through our MS Portal, we have put automated systems in place to assist in issuing refresher questionnaires to Tier 1 suppliers who were previously issued with questionnaires in accordance with our due diligence framework.

If, for example, a supplier's answers to the refresher questionnaires indicate that their modern slavery risk is higher than previously assessed, we will undertake further steps necessary to gain further insight into what has caused their risk to be heightened (for example, issuing communications to the supplier to clarify their answers).

Scoping our Tier 2 and 3 suppliers – supply chain tracing

Building on the momentum and progress of tracing our supply chains in the previous reporting period, we have now issued Tier 2 tracing questionnaires to 44 high and moderate risk Tier 1 suppliers. This questionnaire asks the suppliers to provide us with the names and details of their suppliers (Helping Hand's Tier 2 suppliers) as well as copies of any site audits undertaken on these suppliers.

Helping Hand has chosen to target its highest risk supply chains to undertake supply chain tracing on. Helping Hand will continue this "staggered approach" and expand the issue of these questionnaires to Tier 1 suppliers as appropriate and in addition to the existing due diligence processes.

Based on the results of the questionnaires issued last reporting period, Helping Hand has undertaken risk screenings, risk matrixing and has issued questionnaires to the Tier 2 and Tier 3 suppliers identified in these supply chain tracing exercises to trace deeper down the supply chain. We have also used the results of this exercise to map supply chains by linking all Tier 2 suppliers to Tier 1 suppliers in the MS Portal and we are extending this to any Tier 3 suppliers identified.

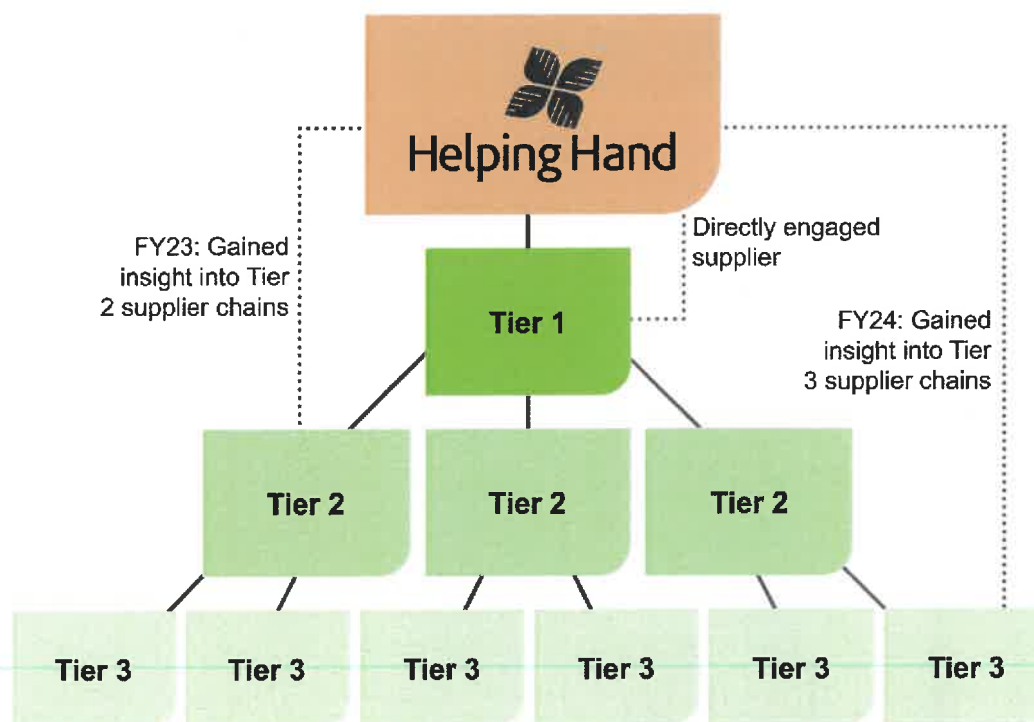
It is a continuing priority for Helping Hand to dive deeper into its supply chains and identify and remediate any risks of modern slavery that are uncovered during this process.

Case Study – Supply Chain Tracing - Tier 2 supplier risk profile

In the last reporting period, Helping Hand chose a supplier who provides cleaning and laundry services for supply chain tracing.

This particular supplier was considered high-risk due to its industry as well as the limited measures that it has in place to address their modern slavery risks which were identified through the modern slavery questionnaire. Because of the lack of measures that they have in place to address modern slavery risk, Helping Hand has also issued modern slavery training to this supplier which they have completed. We issued the supplier with the supply chain tracing questionnaire and the supplier provided us with the details of the suppliers that it engages to provide services to Helping Hand.

Of note, one of their suppliers identified came back with some significant hits through the screening process. For example, a subsidiary of the Tier 2 supplier had been identified as being subject to various labour and employment breaches in Brazil. By identifying this risk, Helping Hand has been able to undertake further due diligence on this supplier and monitor this risk it otherwise would have been unaware of without undertaking this supply chain tracing process.



Training

We continue to train key employees involved with suppliers on what modern slavery is and how to identify risks of modern slavery in Helping Hand’s operations and supply chains.

During this reporting period, our third-party providers reviewed our modern slavery training.

Our training will be updated when our prospective due diligence workflow and our new contractor management system are rolled out to ensure that employees are trained on our new supplier onboarding and due diligence procedures. As part of these updates, we will update the modern slavery training with the Walk Free Foundations 2023 release of the Global Slavery Index.

Procurement and Contracting

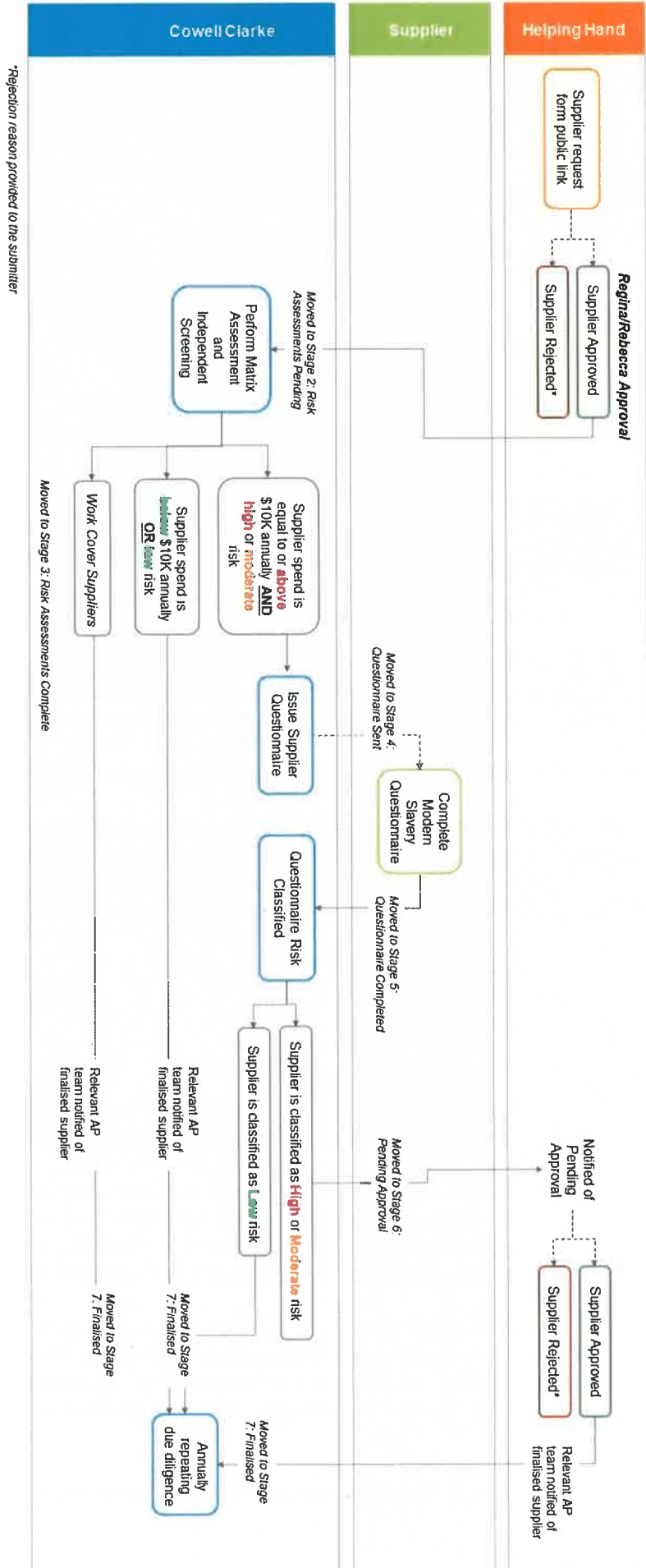
Prospective due diligence framework testing

In line with our aim to minimise the risks of modern slavery within our supply chains, we have continued to work with our third-party advisors to update our internal due diligence frameworks.

In the last reporting period, we had designed the new procurement framework to implement due diligence processes prior to suppliers being engaged by Helping Hand, rather than undertaking due diligence after they have been engaged. Prospective due diligence allows us to identify key risks prior to Helping Hand being “directly linked” to the modern slavery risks.

In this reporting period, we have been able to roll out this prospective due diligence framework across a range of “test” suppliers. During this testing phase, we have been able to iron out any issues to ensure that the process is as effective and streamlined as possible. This progress shows a maturity in our approach to due diligence as we have developed our modern slavery compliance framework.

An example of the prospective due diligence framework is provided below:



Use of technology

Across our supplier base, risk screenings and risk matrixing automatically occur once the supplier is entered into the MS Portal.

This system takes away the manual burden of Helping Hand's due diligence processes. The implementation of prospective due diligence is heavily reliant on the technology in the MS Portal, particularly with how it will link in with our new contract management system.

Contracting

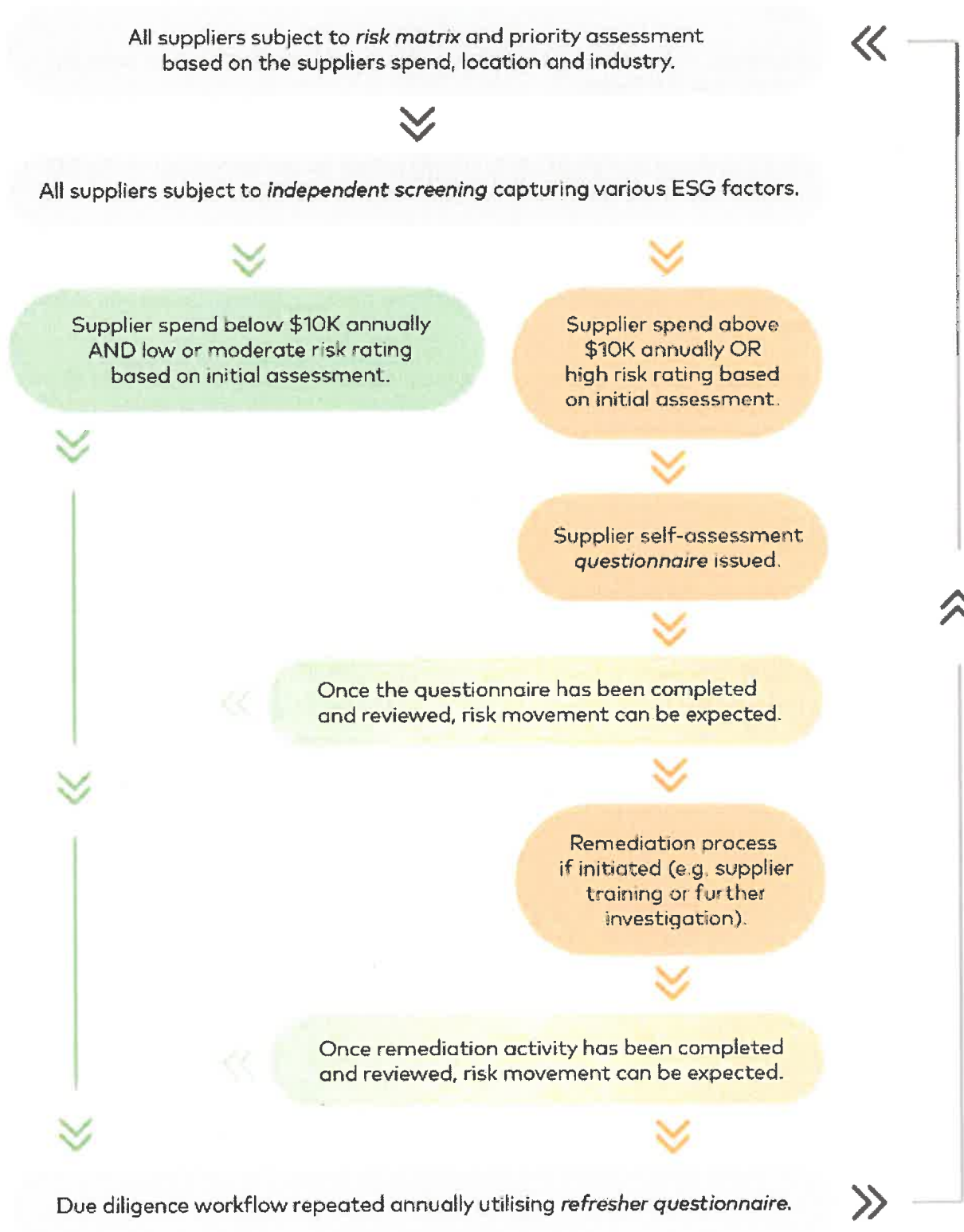
Helping Hand's standard Procurement Agreements have modern slavery clauses as standard, boilerplate clauses.

Helping Hand continues to ensure that modern slavery clauses are implemented into all new Helping Hand issued supplier contracts. As existing supplier contracts are renewed, modern slavery clauses are inserted into the contracts.

Due Diligence

Our due diligence thresholds operate in our present procurement framework as follows:

- / All new suppliers who have a predicted spend above \$10,000 per year and are assessed as moderate or high risk (in accordance with the risk factors identified in Criteria 4 above) will receive a modern slavery questionnaire.
- / All new suppliers who have a predicted spend below \$10,000 per year are moved through the approval process as a supplier.



A summary for the due diligence undertaken in the reporting period (new suppliers and existing suppliers) is as follows:

Risk screenings and risk matrixing

Tier 1: 1,054 suppliers total

New suppliers: 229

	Risk rating			
	No Results ¹	Low	Moderate	High
Risk matrixing	-	128	85	16
Risk screenings	227	3	0	0

Existing suppliers: 825

	Risk rating			
	No Results	Low	Moderate	High
Risk matrixing	-	508	243	74
Risk screenings	815	9	1	0

Tier 2: 58 suppliers total

New suppliers: 21

	Risk rating			
	No Results	Low	Moderate	High
Risk matrixing	-	3	6	12
Risk screenings	21	0	0	0

Existing suppliers: 37

	Risk rating			
	No Results	Low	Moderate	High
Risk matrixing	-	8	8	21
Risk screenings	34	2	1	0

Tier 3: 2 suppliers total

Existing suppliers: 2

	Risk rating			
	No Results	Low	Moderate	High
Risk matrixing	-	2	0	0
Risk screenings	2	0	0	0

Questionnaires

Supplier Questionnaires (completed): 167 suppliers total

¹ "No Results" is in relation to the risk screening process where we have screened a supplier in the screening database and no results have come back during this screening process, meaning that no "hits" or explicit "ESG risks" have been identified during the screening process.

Criteria 5: Effectiveness of Actions

Within this reporting period, we have made significant progress in the maturity and effectiveness of our supply chain oversight, due diligence processes and training for our modern slavery compliance framework.

Measuring effectiveness has continued to be a significant focus in this reporting period and has driven the review and prospective reforms of Helping Hand’s procurement framework.

A summary of our progress in this reporting period is outlined below:

Focus area for FY23: supply chain mapping and prospective due diligence		
Category	Action item	Progress
Governance and policies	Updating of Modern Slavery Policy and Supplier Code of Conduct	Completed
	Consideration of Ethical Sourcing Policy	Template developed, currently being considered for implementation
Training and engagement	Continue to issue modern slavery training to new employees.	Completed
	Review of employee and supplier training	Completed and ongoing
Due diligence (including remediation)	Complete mapping exercises on Tier 2 and 3 suppliers identified in the last reporting period	Completed
	Undertake due diligence on identified Tier 2 and 3 suppliers	Completed and ongoing
	Broaden issue of Tier 2 questionnaires to completely map Tier 3 suppliers and beyond	Completed and ongoing
	Implementation of prospective due diligence procedures	Underway – testing period ongoing
	Continue to follow our remediation processes for suppliers that present any modern slavery risks	Completed and ongoing

Once final implementation of the procurement and due diligence framework has been completed, Helping Hand will undertake a further review to ensure that it is effective on a wider scaled and being followed and understood by our employees.

Benchmarking

To complement the internal review of Helping Hand's procurement processes, Helping Hand has engaged our third-party advisors to undertake a benchmarking exercise on Helping Hand, similar to that undertaken in the last reporting period.

This benchmarking process involved our third-party advisors analysing our FY23 Modern Slavery Statement against the FY23 Modern Slavery Statements of our competitors and reporting on:

- / where Helping Hand ranks in comparison to its competitors in terms of overall compliance with the reporting requirements of the Act; and
- / areas of improvement for Helping Hand (particularly in supplier due diligence processes).

In addition to this internal benchmarking, we have utilised the Walk Free Foundation Benchmarking Tool ("Tool") to assess our modern slavery compliance framework against the benchmarking criteria within the Tool. Helping Hand is in the "Services and Health Care" category and achieved a score of 25 out of 30 (83%). The average score in the "Services and Health Care" category is 15 out of 30 (50%). Whilst Helping Hand scored very well using the Tool, we were able to identify some action items which we can be implemented in future reporting periods.

This benchmarking process assists Helping Hand prepare action items for the next reporting period (in this case, for FY25). Engaging a third party to do this benchmarking process means that the benchmarking process is done objectively and by people with in-depth knowledge of best practice in the area.

This benchmarking process continues to be extremely important in the progression of Helping Hand's modern slavery compliance framework, particularly with the implementation of the Federal Anti-Slavery Commissioner and the incoming implementation of further amendments to the Act.

Criteria 6: Consultation

This criterion is not applicable to Helping Hand.

Criteria 7: Further Information

Helping Hand has taken significant actions to improve its supply chain mapping, identification of modern slavery risks further down its supply chains and establish frameworks for ongoing, robust due diligence within this reporting period whilst also continuing the monitoring of the risk profiles of its existing suppliers.

Significant progress was made in this reporting period towards the implementation of a prospective due diligence framework. Given the changes this new framework will bring to our existing supplier onboarding procedures, the testing phase of this new framework has been critical to understanding the changes need internally to give effect to these new processes.

Therefore, looking forward, Helping Hand are aiming to implement the following in the next reporting period:

Category	Action Item
Governance and policies	Further review and consideration of an Ethical Procurement Policy or a similar procedure document which will guide the new procurement and due diligence framework going forward. Consideration of a KPI Framework for our modern slavery compliance to assess progress against action items for use in future Modern Slavery Statements.
Training and engagement	Review of supplier training on modern slavery and ethical procurement practices) Review and updating of employee training to align with the new perspective due diligence framework (once implemented).
Due diligence (including remediation)	Expansion of prospective due diligence across entire supplier base. Continue and expand our supply chain tracing projects begin undertaking prospective due diligence on new suppliers, including any appropriate remediation for suppliers that present any modern slavery risks.

Helping Hand acknowledges that the *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023* was introduced to Parliament in this reporting period. This implements one aspect of the broader proposed changes to the Act released in May 2023, being the introduction of an Anti-Slavery Commissioner who will promote compliance with the Act and support reporting entities, such as Helping Hand, to address risks of modern slavery.

Helping Hand will continue monitor any movements with the proposed changes to the Act and, with the guidance of our third-party providers, will ensure that our modern slavery compliance framework is up to date and compliant with any changes made to the Act.

Board Approval

This is the fifth modern slavery statement for Helping Hand Aged Care Incorporated and represents the reporting period of 1 July 2023 to 30 June 2024.

Approved by the Helping Hand Aged Care Incorporated Board on 27 August 2024



A handwritten signature in blue ink that reads "Janet Finlay".

Janet Finlay

Chair

