



Ashford Hospital
Flinders Private Hospital
The Memorial Hospital

Modern Slavery Statement

1 January 2024 to 31 December 2024

Reporting Criteria 1: Reporting Entity

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) in respect of Adelaide Community Healthcare Alliance Incorporated (ABN 99 367 793 956) and its wholly owned subsidiary, ACHA FPH Property Pty Ltd (ABN 13 068 752 214), both not-for-profit entities, consolidated and trading as “ACHA” (**ACHA**).

This Modern Slavery Statement is submitted by ACHA in respect of the 12-month period ending 31 December 2024.

Reporting Criteria 2: Structure, Operations and Supply Chains

Overview

ACHA is a community-based and not-for-profit private hospital group in South Australia.

ACHA is a reporting entity for the purposes of the Act, having met the reporting threshold in the Reporting Period. Annual reporting information about ACHA is available from the Australian Charities and Not-for-profits Commission (ACNC).

ACHA has a contractual agreement with Healthscope Operations Pty Ltd (Healthscope) that sees ACHA retain responsibility for strategic direction and governance while Healthscope (**Manager**) takes care of the daily management of operations.

This means the Manager enters contracts on behalf of ACHA for the majority of goods and services required for the operation of the ACHA hospitals. The Manager acquires goods and services on behalf of ACHA where there is a clear nexus between the goods or services provided under the contract and the operations conducted at the ACHA hospital.

Due to the nature of the management relationship between Manager and ACHA, the Manager provides ACHA with:

- All material contracts entered into on behalf of ACHA as part of the Manager’s procurement activities, at the end of every financial year; and
- A copy of the Manager’s Modern Slavery Statement.

Our people are known for achieving exceptional clinical outcomes, transparent public reporting and positive patient feedback that leads the industry. No matter the role, every day our people make a difference to the lives of our patients and their families and it is a privilege to be part of their care.

ACHA is a values-driven organisation and insists that its employees go beyond just complying with laws, regulations and with basic standards of personal conduct. We understand that creating a culture for employees to develop, work safely and thrive, has a profound impact on our business, our patients, their families and our doctors. Along with our Manager, ACHA is committed to identifying and addressing the risk of modern slavery within operations and supply chains. As both a purchaser and provider of services, our responsibility to take meaningful action to prevent practices such as slavery, forced labour, and involuntary servitude is understood. This aligns with our core values and ethical foundations.

We take safety seriously. It underpins our values and reflects our commitment to protecting ourselves and those around us. At ACHA we proactively identify and address unsafe conditions and not accepting injury as part of working at ACHA. We are truly committed to creating a safe workplace for everyone, because we care.

ACHA's business and operations

ACHA is an Association, incorporated under the *Associations Incorporation Act 1985 (SA)* and governed by a Board of six Directors in accordance with its Constitution.

ACHA is registered as a charity by the Australian Charities and Not-for-profits Commission (ACNC) and as an income tax exempt charitable entity under Subdivision 50B of the Income Tax Assessment Act 1997.

ACHA's operations are comprised of:

- Ashford Hospital, complemented by an Emergency Service
- Flinders Private Hospital
- The Memorial Hospital

ACHA's corporate office is located at 1 Flinders Drive, Bedford Park, SA 5042.

ACHA provides a wide range of high quality healthcare services through its collection of acute medical, rehabilitation, surgical and obstetric hospitals. We engage a broad range of highly skilled professionals to deliver these services, as employees, contractors, doctors and partners.

ACHA employees 2,450 people treats in excess of 76,000 patients per year, delivers more than 1,300 babies and performs over 54,000 episodes of care.

A subsidiary of ACHA, ACHA FPH Property Pty Ltd, was established for the development of Flinders Private Hospital, for the purpose of fulfilling the requirements of the Flinders Medical Centre Private Development Project. It is managed by a board of three Directors (who are also Directors of ACHA) in accordance with its Constitution. It is registered as a charity and as an income tax exempt charitable entity under Subdivision 50B of the Income Tax Assessment Act 1997.

Also included in this Statement is the ACHA Foundation Incorporated, a small charity with annual revenue usually less than \$100k. It has two common Directors with ACHA, uses the same policies and procedures and accesses shared suppliers.

Supply chain

ACHA's relationship with Healthscope provides access to, and support for, a range of operational and corporate management functions. To that end, the Manager has developed a comprehensive approach to achieving Modern Slavery Act compliance, which has been reviewed and evaluated by the ACHA Board to be both appropriate and applicable to ACHA operations and its supply chain.

ACHA's supply chain includes a diverse range of local and international suppliers, with most relationships managed directly through formal commercial agreements undertaken by the Manager. The goods and services procured span from local contingent labour and travel services to corporate office supplies and critical medical consumables.

The largest areas of expenditure are clinical equipment and medical materials, which are sourced by the Manager's centralised procurement team. This team comprises dedicated professionals who are required to complete the Manager's Employee Code of Conduct training, as well as specific training on modern slavery risks, including the Australian Government's *Modern Slavery in Public Procurement* module provided by the Attorney-General's Department.

Reporting Criteria 3: Risk of Modern Slavery Practices in our operations and supply chains

ACHA is committed to supporting all efforts to stop modern slavery.

ACHA's operations are solely based within Australia and the Manager's primary operations are also based in Australia, where the risk of direct involvement in modern slavery practices is considered extremely low. However, greater consideration is given to the extended supply chain, where potential risks may arise.

Suppliers for ACHA and the Manager span both local and international markets comprising and include manufacturers, distributors, agencies, brokers, consultants, and other service providers.

The review conducted by the Manager of the supply chain of providers relevant to our operations, included the following categories of spend:

Supply chain covers a wide range of spend categories of spend categories, including:

- **Clinical products and equipment** – such as prostheses, medical consumables, surgical equipment, instruments, and pharmaceuticals
- **Utilities** – including gas and electricity
- **Indirect Corporate spend** – such as IT contractors, professional services, software licences, and hardware
- **Facilities management** – such as maintenance, security and fire protection services
- **Site services** – including contingent labour, cleaning, catering, waste and linen services and biomedical engineering
- **Corporate services** – such as travel and entertainment

The Manager has assessed these categories for modern slavery risks and recognises potential exposure, particularly with suppliers that manufacture or distribute products in higher-risk countries including China, Hong Kong, Taiwan, Malaysia, Pakistan, and India.

The most significant risk lies in the limited transparency of second and third-tier suppliers—commonly referred to as “downstream” suppliers—where modern slavery practices may be more prevalent and difficult to detect.

In summary, the Manager has identified two primary sources of risk:

1. Direct engagement with suppliers operating in high-risk countries; and
2. Indirect exposure through downstream supply chains that currently lack visibility.

Reporting Criteria 4: Assessing and addressing modern slavery risks

Internal Policies and Practices

The Manager continues to operate under an Enterprise Risk Management Framework overseen by their Audit, Risk & Compliance Committee. This framework, underpinned by their Risk Management Policy, strengthens the Manager’s capability to identify, assess, and manage enterprise-wide risks, including modern slavery. The ACHA Board has also endorsed an ACHA Risk Management Policy.

ACHA and the Manager are committed to upholding our Employee Codes of Conduct, which reflect our core values and the ethical expectations of the broader community. Both Codes explicitly prohibits all forms of modern slavery and aligns with relevant laws and ethical guidelines.

The Codes of Conduct applies to all individuals associated with ACHA (and the Manager), including employees, contractors, subcontractors, consultants, Visiting Medical Officers, and agency staff. It sets clear expectations for professional and ethical behaviour in the workplace and aims to:

- Promote high standards of professionalism and ethical conduct across all roles and functions;
- Foster a respectful, safe, and inclusive work environment;
- Raise awareness of the consequences of breaching the Code; and
- Reinforce the responsibility of all individuals to embody ACHA’s (and the Manager’s) values and maintain the trust and confidence of our patients, colleagues, and community.

The Employee Code of Conduct is supported by a comprehensive suite of corporate policies and procedures applicable to all ACHA facilities and staff. This includes a robust Whistleblower Policy, which provides access to a Toll-Free Ethics Hotline, an internal Whistleblower Protection Officer, and a structured response framework to address reported concerns.

ACHA delivers mandatory eLearning modules, including online training module for the Employee Code of Conduct, to ensure employees understand and apply these expectations in their roles.

The Manager's People, Remuneration and WH&S Committees have responsibility for endorsing and reviewing the effectiveness of the People Strategy, which includes remuneration arrangements, Diversity and Inclusion Policy, and staff engagement.

Supplier Code of Conduct

The Manager also maintains a Supplier Code of Conduct, which outlines expectations of ethical business practices and compliance with modern slavery laws. All suppliers are required to:

- Operate in accordance with applicable national and international laws and regulations;
- Demonstrate integrity and transparency in all business dealings; and
- Ensure their own supply chains are free from modern slavery and related exploitative practices.

Suppliers are expected to cascade these standards throughout their own networks and take appropriate action if any risks or breaches are identified.

Access to the Manager's Supplier Code of Conduct is publicly accessible via the Manager's website: <https://healthscope.com.au/internal-pages/sustainability>

Actions Taken

To mitigate the potential risk of modern slavery in the supply chain, a structured and ongoing program of action has been implemented by the Manager. Guided by a continuous improvement framework—**Plan, Do, Check, Act**—this approach enables the Manager to adapt and strengthen compliance efforts as the program matures. This model has proven effective across various domains and has been deliberately applied to the modern slavery response.

During the reporting period, the Manager undertook the following actions to address modern slavery risks within its direct operations:

1. Policy updates

The Manager enhanced its processes regarding Third-Party due diligence. Their Procurement Policy was revised to require all staff complete due diligence checks when engaging with suppliers. This includes mandatory completion of the Supplier Due Diligence Workbook accessible via the Manager's (and ACHA's) intranet. The workbook assesses supplier compliance across several domains, including Work Health and Safety (WHS), anti-bribery and corruption, and modern slavery.

The revised policy also includes a dedicated section on modern slavery, reinforcing staff responsibilities to identify, escalate, and act on modern slavery risks. It mandates that supplier contracts include modern slavery provisions, with any deviations subject to review by the Manager's Legal team.

2. Modern slavery training

The Manager's Corporate Procurement and Supply Chain team completed the Australian Government's *Modern Slavery in Public Procurement* training module. In addition, work is underway to develop a broader internal training program on modern slavery obligations, which will be rolled out across the wider organisation.

3. Due diligence activities

In 2024, the Manager conducted annual audits of several critical suppliers. These audits helped assess each supplier's modern slavery compliance status and identified any known risks within their extended supply chains. Where gaps were identified, the Manager worked collaboratively with suppliers to address and close them.

A new requirement was also introduced for the Manager's head office procurement team: new suppliers must now complete the Third-Party Due Diligence Questionnaire before engagement.

Reporting Criteria 5: Evaluating effectiveness and looking ahead

ACHA and the Manager recognises the importance of continual improvement in efforts to combat modern slavery. In the previous reporting period, several key objectives were set by the Manager: to strengthen their response to potential non-compliance, update relevant organisational policies, embed modern slavery risk management into corporate governance processes (including Board-level reporting) and assess the effectiveness of their due diligence processes with top-tier suppliers.

The actions outlined in Reporting Criteria 4 demonstrate meaningful progress toward these goals. However, it is acknowledged that further work is required, particularly in establishing clearer internal protocols for responding to suspected non-compliance with modern slavery standards within the Manager's supply chain.

Key Focus Areas for the Next Reporting Period:

- **Supplier Audits in High-Risk Regions:**
To address identified risks associated with direct sourcing from high-risk countries, the Manager will continue auditing selected direct suppliers. This will include on-site visits by procurement team members to assess third-party risks—particularly modern slavery—at primary manufacturing facilities for new suppliers.
- **Modern Slavery Policy Development:**
The Manager will seek executive endorsement to develop a standalone Modern Slavery Policy, providing clear organisational direction and accountability by the end of 2025.
- **Policy Review and Staff Guidance:**
The Manager will continue to assess and revise relevant policies, ensuring they include updated guidance for staff on recognising and responding to potential instances of non-compliance with modern slavery expectations.
- **Procurement Policy Evaluation:**
The Manager's newly introduced procurement policy mandate—which requires robust due diligence for supplier engagement—will be evaluated for effectiveness and uptake across the broader organisation.

- **Employee Engagement and Training:**

The Manager will collaborate with their People & Culture team to enhance staff engagement with the Employee Code of Conduct training module, ensuring modern slavery awareness becomes embedded in day-to-day responsibilities.

Through the Manager's Audit, Risk & Compliance Committee, an Enterprise Risk Management Framework, along with a Risk Management Policy is in place to improve the identification, treatment and monitoring of enterprise risks. Also adopted by ACHA, these measures are principally designed to support a strong risk identification and management culture increasing capability broadly across the business.

Progress against these key focus areas will be monitored by the Manager's Audit & Risk Committee, with regular updates provided to their Executive Leadership Team through the third-party risk management reporting process. Updates will be presented to the ACHA leadership team on a periodic basis as determined by the business.

Reporting Criteria 6 & 7: Consultation, endorsement and other matters

During the reporting period this statement covers, ACHA consulted with its Manager, Healthscope, and the Directors of ACHA FPH Property Pty Ltd and the ACHA Foundation in the development of this Statement.

The Manager sought input from key internal stakeholders, including representatives from Procurement, Operations, and Legal to ensure a comprehensive and accurate reflection of their approach to modern slavery risk management.

The Board of Directors has approved this statement on behalf of ACHA and the entities it owns or controls, and has authorised it to be signed by the Chairman.



Tony Johnson

ACHA Board Chairman

25 June 2025