



Modern Slavery Statement

1 July 2020 to 30 June 2021

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This statement

Eldercare is pleased to present its second modern slavery statement. This statement is for the reporting period of 1 July 2020 to 30 June 2021 and addresses the requirements of the Modern Slavery Act 2018 (Cth) (“**Act**”).

In this statement we set out all the initiatives, actions and progress we have made to assess and address risks of modern slavery in our organisation and supply chains. Eldercare is committed to taking genuine steps to meet its obligations pursuant to the Act and is pleased to set them out in this statement.

Eldercare is proud of the work it is undertaking regarding identifying risks of modern slavery and the culture at Eldercare, whereby personnel have embraced and engaged why we need to identify risks of modern slavery.

In the reporting period, Eldercare has worked closely with its suppliers and partners to assess and address any risks and holds itself and third parties that it is connected to high standards.

This statement has been reviewed and approved by the Eldercare Board.

Reporting Entity – Eldercare Australia Ltd

Australian Business Number - 63 758 127 271

Head Office – 247 Fullarton Road, Eastwood South Australia 5063

Website - <https://www.eldercare.net.au>

About us

Eldercare is one of South Australia's largest and most experienced aged care providers. Eldercare has been caring for older South Australians since 1959.

Our Purpose

Eldercare delivers peace of mind with our care.

As one of South Australia's leading aged care and retirement living providers, we place residents at the heart of everything that we do.



Our Values

Eldercare is a values-driven organisation. We have a purpose of delivering peace of mind with our care. Eldercare has a culture and service delivery focused on our core values.



Respect

We protect the dignity, rights and values of individuals.



Accountability

We are all responsible for working safely and with integrity.



Connection

We develop vibrant and supportive relationships based on warmth and generosity.

Our community

Eldercare is a diverse community. Eldercare is committed to living its values every day and has created a culture that respects difference, promotes inclusion and supports everyone to feel safe and welcome.

Our approach

Given Eldercare’s values, it follows that Eldercare opposes modern slavery in all forms and in the operations of our suppliers.

Eldercare is committed to continuously improving its actions. Eldercare acknowledges that risk profiles can change and its processes must evolve so we can meaningfully assess and address any risks of modern slavery.

FY21 Key highlights



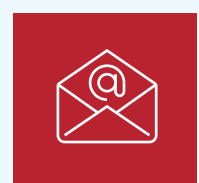
Expanded rollout of questionnaire

Auditing effectiveness of actions



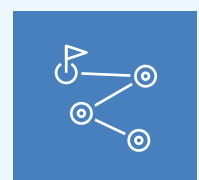
Supplier remediation

Communications rollout



Training of employees and suppliers

Continued due diligence



Implementation of specific contract clause

Implementation of risk analysis on new suppliers



Criteria 2

Structure, operations and supply chains

Structure

Eldercare Australia Ltd is a company limited by guarantee and not for profit entity registered with the Australian Charities and Not-for-profits Commission. Eldercare's operations are headquartered and solely based in South Australia.

Eldercare does not own or control any other entities.

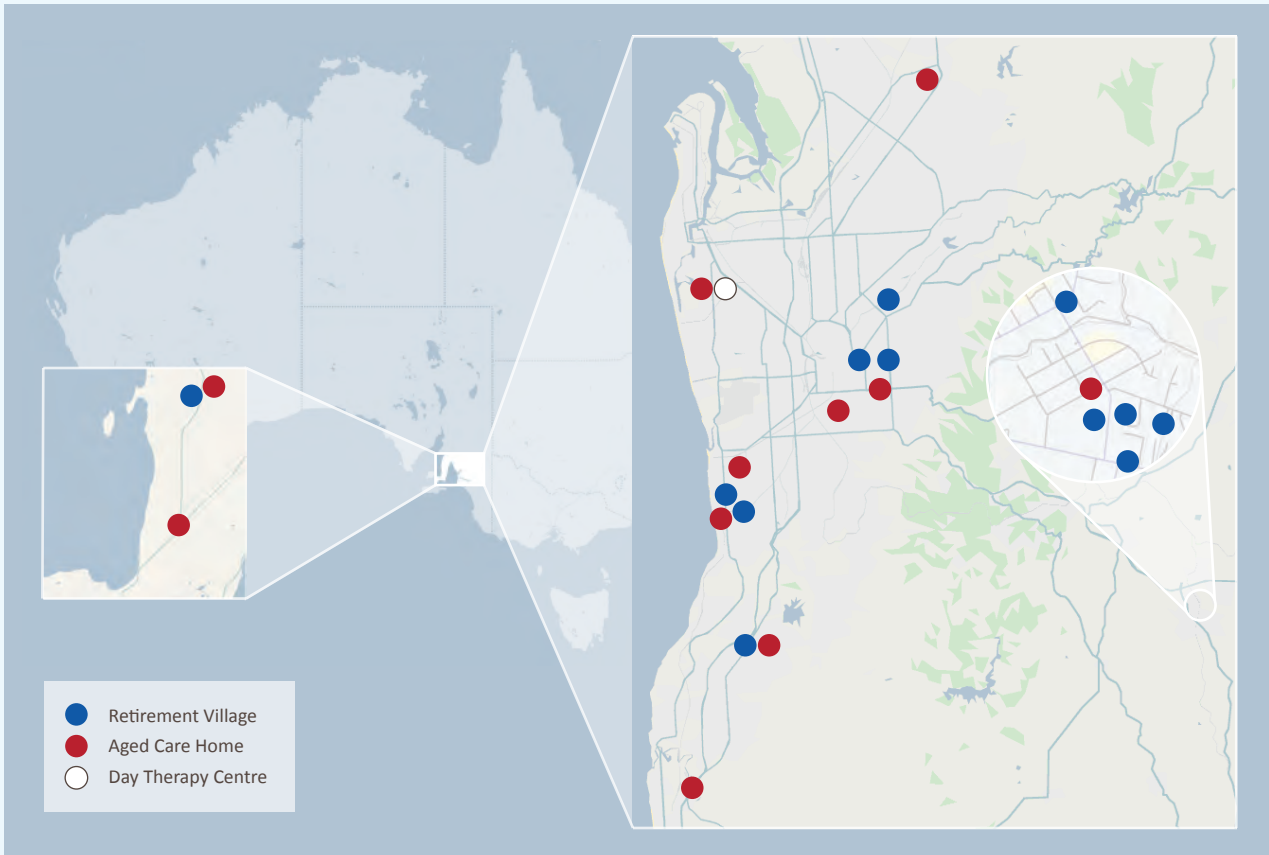
Eldercare is governed by a Board and led by an Executive team who provide strong, focused leadership and set our strategic directions, making sure we deliver peace of mind with our care. The Board and Executive team set the tone for our organisation and this leadership demonstrates our commitment to assess and address risks of modern slavery in our organisation and supply chains.

Operations

Eldercare is an experienced aged care provider. Eldercare is supported by more than 1,600 staff and over 350 passionate volunteers. At a glance, Eldercare has:

- Approximately 1,000 residents cared for at 11 aged care homes across South Australia.
- 200 self-contained independent living units across 12 retirement villages.
- An allied health service assisting over 300 clients at Eldercare’s day therapy centre.

Locations of Eldercare Sites

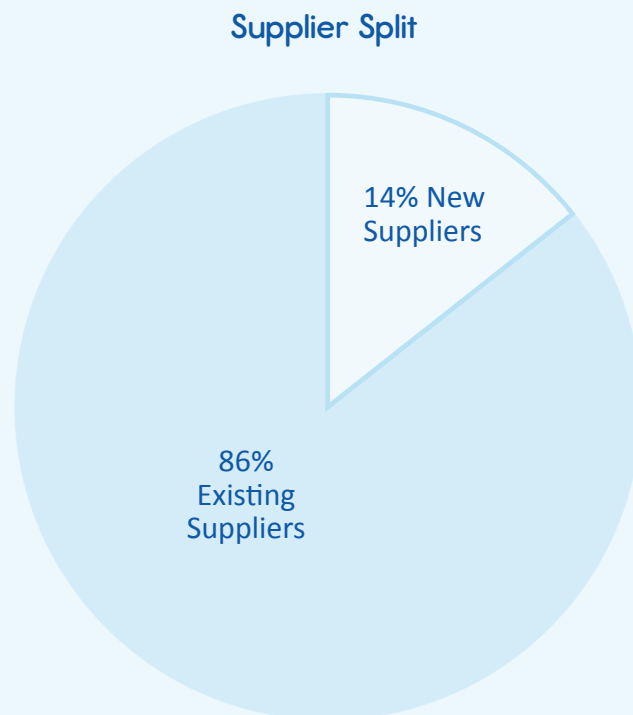


Eldercare also has an investment portfolio of securities. The returns from which are used to subsidise the operations of the organisation.

Supplier relationships

Suppliers are integral to Eldercare’s operations to provide the highest service and care to our clients. Eldercare seeks to engage suppliers that are reputable, quality focused and industry leaders in their sector. As Eldercare is based in South Australia, Eldercare engages Australian and predominantly South Australian tier one suppliers. Eldercare supports and engages local suppliers in locations where possible, ensuring the support of local business and the surrounding community.

Eldercare generally has long term stable relationships with its suppliers and to that end, has a preferred supplier list. In the reporting period Eldercare directly engaged with a total of 546 suppliers. In the reporting period Eldercare engaged 38 new suppliers.



Centre-led procurement

Eldercare has high visibility over its suppliers and supply chains with its strong procedures and leadership. Eldercare has a centre-led category management procurement model and partners with other Uniting Care members nationally to drive economies of scale in the goods and services it sources. This provides for centralised strategic procurement decisions, strong contract compliance, management of suppliers underpinned by standardised goods, services and purchasing processes.

With the implementation of strong and consistent procedures, Eldercare can thoroughly assess risks when new suppliers are on-boarded. Furthermore, Eldercare can monitor change in risk profiles of suppliers and action any such risks.

Where Eldercare approves suppliers to engage sub-contractors, Eldercare ensures oversight and compliance is maximised over their operations through registration into a contractor management system. Contractors provide relevant declarations, insurance details and police checks which can be tracked at point of entry in all Eldercare facilities.

Supply chains

Eldercare requires a diverse range of goods and services across various categories to deliver the services it provides.

In FY21, Eldercare engaged with 546 suppliers with 100% being located in Australia and 77% in South Australia. All suppliers enter into contractual arrangements, ranging from purchase orders governed by standard terms and conditions to contractor agreements and bespoke larger agreements.

The main types of goods and services that Eldercare procures can be summarised into two overarching parts; direct care related and ancillary goods and services to support direct care as follows.

Direct care

Care services – including nurses, personal care workers, allied health professionals, medical consumables, medical equipment, pharmaceuticals, direct care related support equipment and personal protective equipment.

Hospitality – including hospitality labour, food, catering/cleaning/laundry consumables, and linen.

Wellbeing – including chaplaincy, lifestyle activities, events, and entertainment.

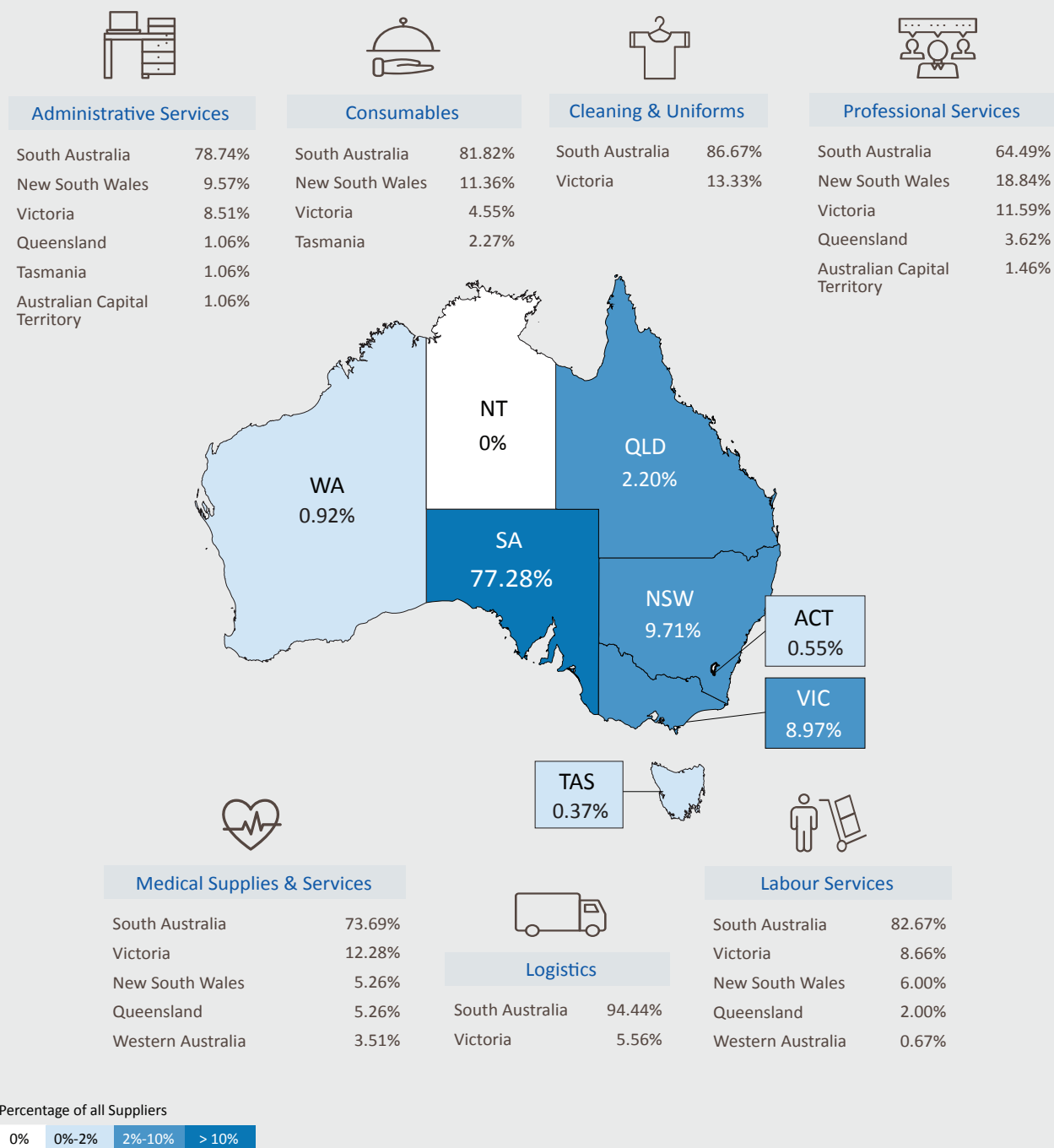
Support services to direct care

Business administration – professional and administrative services, consultancy, IT, insurance, head office support.

Property services – utilities, maintenance to buildings and grounds, equipment servicing, new building projects and refurbishments.

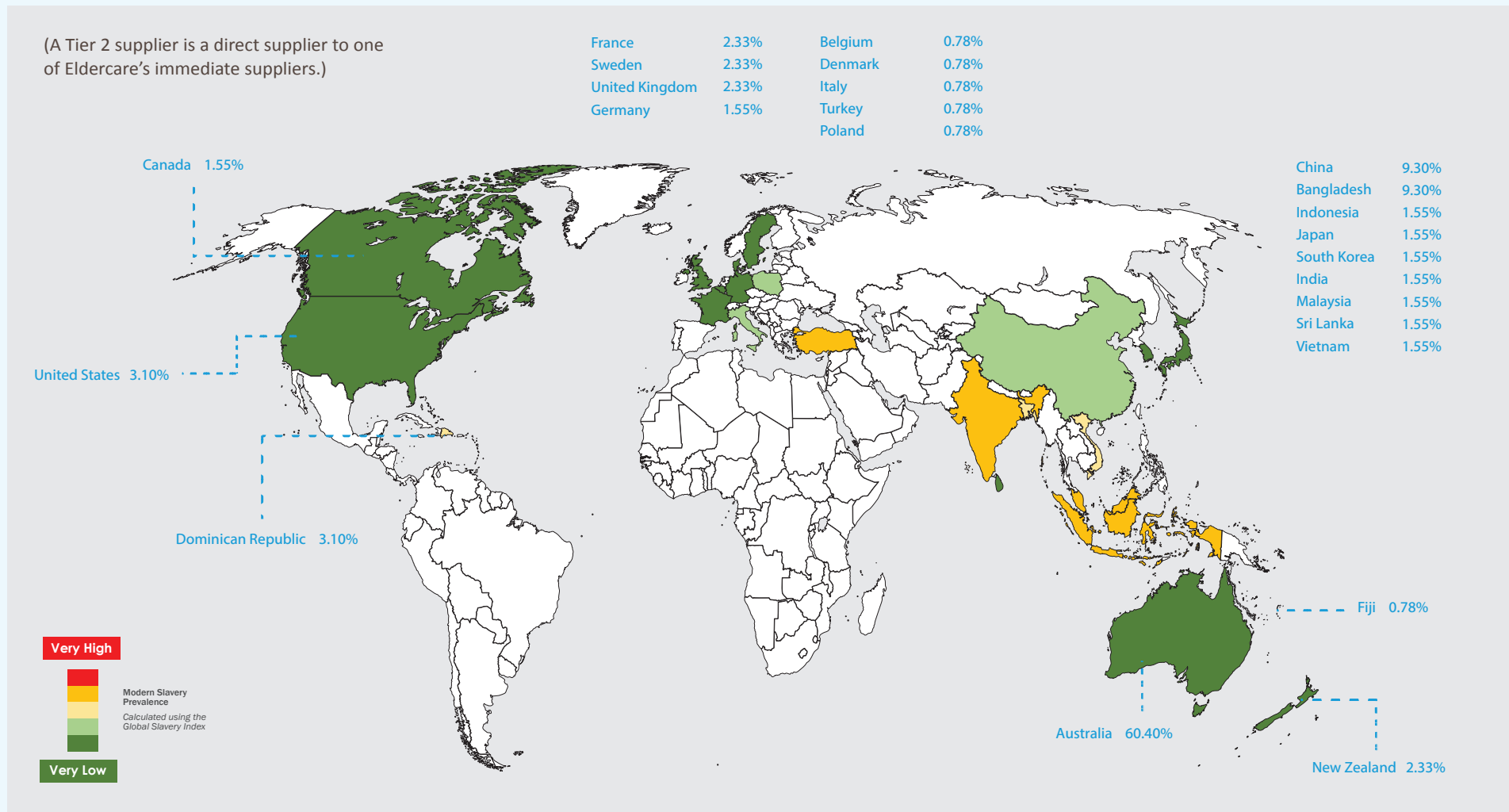
In the reporting period, Eldercare undertook detailed analysis to identify locations of its direct suppliers and also analysis beyond direct suppliers, deeper into our supply chains. Source locations of raw materials have also been identified. The following map demonstrates the locations of our tier 1 suppliers, followed by deeper analysis of our supply chains, particularly the global nature of our supply chains beyond our immediate suppliers.

Eldercare's Tier 1 suppliers



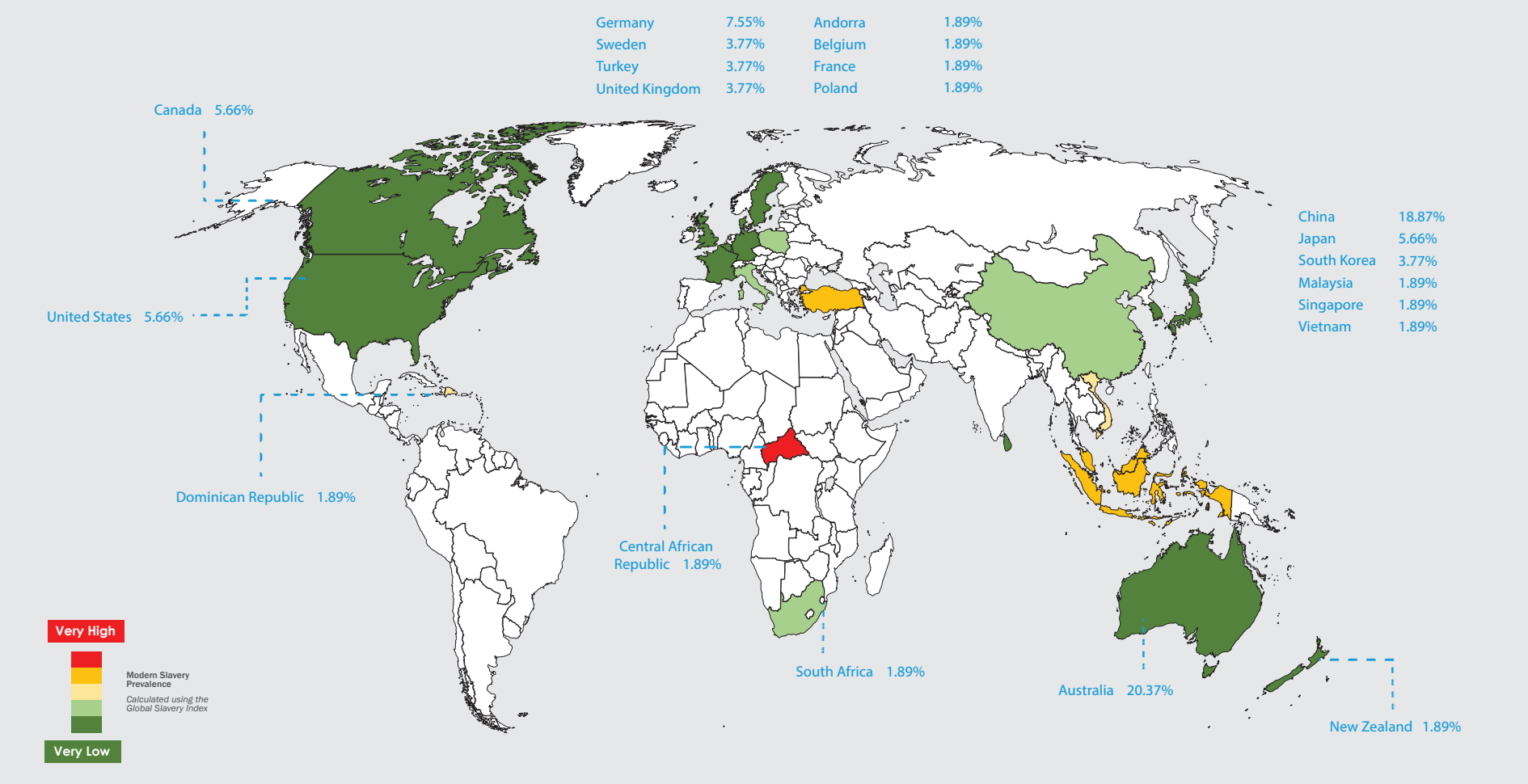
Eldercare supports Australian suppliers, with specific emphasis on those suppliers located in South Australia. This map demonstrates the local nature of Eldercare's immediate suppliers.

Eldercare's Tier 2 suppliers



Eldercare has mapped locations of goods and services beyond its immediate suppliers. This map demonstrates locations of goods and services of Eldercare's tier 2 suppliers.

Raw materials



Eldercare has mapped 54% of its raw material locations of suppliers who have had due diligence conducted on them.



Criteria 3

Risks of modern slavery

Eldercare is cognisant that modern slavery is a complex global issue and often out of sight. Modern slavery describes serious exploitation in many forms including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worse forms of child labour.

Although matters such as underpayment and substandard working conditions do not constitute modern slavery, Eldercare understands that these may be indicators of modern slavery and are therefore no less important to identify when considering risks of modern slavery.

Eldercare's operations

Eldercare's operations are located solely within South Australia. In combination with Australia's low prevalence of modern slavery and Eldercare's strong governance framework and leadership, Eldercare is of the view that the risk of modern slavery within Eldercare's operations is low.

Eldercare operates in accordance with its legal framework and seeks to create a culture that operates in accordance with our values. To that end:

- all employees are paid in accordance with Australian laws and requirements;
- additional avenues are provided to employees (and its suppliers) to report concerns, such as Eldercare's whistleblower and employee assistance frameworks and supplier code of conduct; and
- Eldercare has implemented and is rolling out a modern slavery training program.

These mechanisms and systems further contribute to the risk of modern slavery within the operations of Eldercare being extremely low.

Third Party Risk

Directly linked modern slavery

Eldercare considers that risks of modern slavery are more likely to be present with third parties, such as suppliers that are linked to the operations of Eldercare. Given the results of the due diligence undertaken on our tier one suppliers to date, we are of the view that risks are more likely to present where we have less visibility, deep in our supply chains. Eldercare is taking a risk-based, targeted approach to look further down our supply chains and prioritise action.

Some areas of our supply chains present higher risk than others. We understand that matters such as the type of goods provided in combination with vulnerable populations and higher risk locations present a higher risk of modern slavery.



The following goods and services present a higher risk of modern slavery in Eldercare’s supply chain:

Type of Goods and Services	Risk Profile	Number of Suppliers	Locations of Suppliers	Due Diligence Undertaken	Next Steps
Linen, clothing and textiles	This industry is subject to extensive labour exploitation and identified as one of the five key industries implicated in modern slavery. Workers in linen, clothing and textile industries often experience excessive work hours, poor working conditions, and are paid below a living wage. These conditions are reported to have worsened due to low-demand during the pandemic.	5	SA – 3 VIC – 2	Suppliers were independently screened and assessed based on their risk profile. Moderate and high risk suppliers were issued a questionnaire to further assess their level of risk. All suppliers initially identified as moderate or high risk were downgraded to low risk based on the results of the questionnaire.	Prioritise high risk tier 2 suppliers and begin due diligence down the supply chain, as the cotton industry that produces the linen and clothing is identified as high risk for modern slavery.
Cleaning	The nature of the cleaning industry frequently attracts unskilled, migrant workers. As this is a vulnerable minority, substandard working conditions, debt bondage and deceptive recruitment is prevalent in this industry. The complexity of the industry often results in an opaque supply chain, hindering oversight mechanisms.	9	SA – 9	Following a risk assessment screening, high and moderate risk suppliers were issued a questionnaire to assess their actions to mitigate the risk of modern slavery. Suppliers that maintained a high or moderate risk score following the questionnaire were issued modern slavery training.	Follow-up high and moderate risk suppliers after modern slavery training is issued to determine whether they have remediated any of their risk.

Type of Goods and Services	Risk Profile	Number of Suppliers	Locations of Suppliers	Due Diligence Undertaken	Next Steps
Food	Due to the nature of work involved in production, processing, packaging and transport of food, these supply chains have a high risk of modern slavery occurring. Labour hire contractors are often engaged to recruit backpackers, seasonal or migrant workers which increases the risk of passport retention and bonded labour to occur.	44	SA – 36 NSW – 5 VIC – 2 TAS – 1	All direct suppliers were screened for risk areas, including modern slavery. Questionnaires were issued high and moderate risk suppliers on their operations and supply chains. Where a supplier maintained a moderate to high risk rating, modern slavery training was issued for the supplier to complete.	Prioritise high risk tier 2 suppliers and begin due diligence. Follow up all outstanding tier 1 suppliers who were classed as high and moderate risk.
Construction and building materials	The complex and multi-layered supply chains in the construction industry makes it highly susceptible to modern slavery. Dangerous working conditions, physically demanding work and short timelines can compromise safe working practices and contribute to exploitation of workers. Building materials, including bricks and rubber, are often sourced overseas from countries that are highly susceptible to child and forced labour.	13	SA – 12 NSW – 1	Following a risk assessment and supplier questionnaire, all moderate and high risk suppliers were issued modern slavery training. All high risk suppliers have been down-graded to low or moderate risk.	Begin due diligence down the supply chain. Align due diligence measures with the Property Council of Australia’s modern slavery standards.

Type of Goods and Services	Risk Profile	Number of Suppliers	Locations of Suppliers	Due Diligence Undertaken	Next Steps
Personal Protective Equipment	Due to the increasing demand for PPE during the pandemic, supplies have been sourced rapidly from countries reported to be high risk for forced labour, poor working conditions and excessive working hours.	1	SA – 1	Risk assessment was completed and identified this supplier as low risk. Supplier issued questionnaire which confirmed the supplier had measures in place to mitigate the risk of modern slavery from occurring in its operations.	Review procurement strategies to ensure our modern slavery policies are embedded within our supplier onboarding processes.
Electronics	The electronic industry has developed a poor reputation for forced labour, debt bondage and deceptive recruitment. The demand for electronic goods has increased exponentially causing supply chains to become more complex, leading to exploitation and abuse of workers. Major international electronics brands use Malaysian factories for manufacturing. Malaysia has been reported as a high risk country for human trafficking.	11	SA – 9 VIC – 2	Risk assessment was conducted on the suppliers as well as red flag screening. Where required, questionnaires were issued. All suppliers have been rated as low risk.	Prioritise high risk tier 2 suppliers and begin due diligence. Follow up outstanding tier 1 suppliers who were issued a questionnaire.

Type of Goods and Services	Risk Profile	Number of Suppliers	Locations of Suppliers	Due Diligence Undertaken	Next Steps
Labour Hire	The labour hire industry by its very nature is a high-risk business model with limited regulation of labour practices. It is subject to modern slavery risks due to the reduced visibility over recruitment practices. This increases the risk of deceptive recruitment, debt bondage, substandard working conditions and underpayment of wages.	7	SA – 3 VIC – 2 NSW – 2	Risk assessments, screenings and questionnaires have been issued to suppliers. As a few suppliers remain as moderate or high risk, modern slavery training has been issued to these suppliers.	Follow up outstanding tier 1 suppliers with a moderate or high risk rating. Investigate further down their supply chains to tier 2 suppliers.

Example

From the extensive due diligence undertaken on suppliers, Eldercare has identified that some raw materials in its supply chains originate from locations such as Central African Republic. Central African Republic has a high prevalence of modern slavery, with estimated victims of 101,000 and a population of approximately 4,546,000.

Contributing to modern slavery

Eldercare understands the need to consider any risks that our operations or actions may contribute to modern slavery. This includes, for example, setting unrealistic costs or delivery timeframes.

To that end, our centralised procurement team manages relationships with our suppliers. Our highly skilled team ensure that they pre-empt potential shortages and when additional goods and services may be required. This ensures that suppliers are given adequate lead times, such that Eldercare does not place undue pressure on suppliers to provide goods and services in unrealistic timeframes. Given this, the risk that Eldercare contributes to modern slavery is low.

Heightened risks due to COVID-19

During the pandemic of COVID-19, Eldercare has rapidly responded to Government directions, for example, directions such as masks must be worn in high-risk settings such as aged care facilities. In these instances, and to comply with such directions, Eldercare has been required to source items such as masks in large volumes in short periods of time. Notwithstanding the best endeavours of our procurement team to pre-empt and give our suppliers appropriate lead times, the impact of COVID-19 has required that orders of certain goods and services are required in shorter time periods. Where possible Eldercare has interrogated suppliers regarding the origin of goods however reverse due diligence will be implemented, if necessary, in these unique circumstances.

Criteria 4

Actions Eldercare has taken

In the reporting period, Eldercare has taken meaningful action to continue to evolve its modern slavery compliance processes and procedures to assess and address modern slavery risks. Eldercare considers that it is important to:

- take a risk based approach to due diligence;
- ensure actions are fit for purpose and prioritised to meet the needs of our organisation; embed due diligence and a compliance framework within our organisation, including
- implementing controls and processes that are part of everyday business; and take a balanced practical approach to ensure suppliers are encouraged to collaborate to do business with us.

Summary of actions

As this is Eldercare's second reporting period, Eldercare has focused on expanding the actions, systems and processes implemented in our first reporting period to assess and address modern slavery risks. Key actions in the reporting period include:

Governance and leadership



Leading from the top to show our commitment to address and mitigate risks of modern slavery.

Organisation wide presentations and written communications by executives.

Supply chain mapping



Expanded supply chain mapping and scoping on all tier 1 suppliers, tier 2 suppliers and raw materials.

Remediation



Following up potential risks arising from due diligence.

Training program for suppliers.

Remediation plans and tracking implemented.

Training



Interactive employee training launched and implemented.

Interactive supplier training launched and implemented.

Contracts



Rollout of modern slavery contract clause to existing contracts.

Advice



Continued to engage a third party to provide modern slavery compliance guidance.

Due diligence



Expansion of our modern slavery compliance technology solution.

Extended due diligence on existing tier 1 suppliers.

Built in due diligence within Eldercare's contractor compliance systems.

Rollout of due diligence program on new suppliers.

Commenced annual refreshment program of due diligence on suppliers.

Continuous monitoring.

Increased controls for third parties entering Eldercare sites.

Implementation of third party site audit program.

Conducted due diligence on investment portfolio.

Audit program



Internal annual audit and testing program launched.

Action plan



Implementation and rollout of annual modern slavery action plan.



Governance and leadership

Eldercare demonstrates our commitment to addressing and mitigating risks of modern slavery by the actions we take. We understand that action and influence comes from the top with our Board and Executive Team committed to sustainable and long-term positive outcomes for our organisation.

Our Corporate Services Executive is responsible for the overall management of our modern slavery compliance framework. This ensures accountability with our actions being directly reported to the Board. Our Manager for Procurement and Contracts is our modern slavery compliance champion, managing the day-to-day operations of our modern slavery compliance framework.

We understand that communication is key and input from various areas of our organisation can assist with identifying issues. To facilitate this, we have presented our progress on our modern slavery compliance program to the organisation, including our analysis of risk deeper in our supply chains. Further, we have issued written communications from our Corporate Services Executive organisation wide as to our approach to modern slavery risks and next steps our organisation is taking.

To underpin our governance framework, we have policies and procedures including:

- Modern Slavery Policy.
 - Code of Conduct.
 - Supplier Code of Conduct.
- Procurement Policy

Our policies and procedures are subject to formal review, to ensure that they are current and effective.



Advice

We continue to engage a third party to provide overall guidance and advice to ensure that we are meeting our modern slavery compliance obligations. This advice ensures that we are evolving our processes, adopting best practice, implementing the appropriate actions and being critical of our systems and processes.

The third party also helps us manage our modern slavery technology platform, a robust system for conducting due diligence on suppliers, tracking, remediating and reporting.



Supply chain mapping

In order to take a risk based targeted approach to our due diligence and prioritise areas of our supply chains that present the most risk, in the reporting period we undertook detailed supply chain mapping. This included where our immediate tier 1 suppliers are located and the goods and services they provide to us, the locations of our tier 2 suppliers and the goods and services they provide to our tier 1 suppliers as well as commencing mapping the locations of where our raw materials originate.

This mapping has allowed us to focus our due diligence on those suppliers that present the higher risk. We can now take a targeted approach to investing deeper in our supply chains, where we have less visibility. We will continue our journey to look deeper in our supply chain in the next reporting period.



Due diligence

Our aim with our due diligence program is to implement robust, rounded systems and procedures. We take a multi-faceted approach to due diligence, to ensure any potential risks are identified.

Technology solution

In the first reporting period, Eldercare launched its modern slavery compliance technology solution, known as our Modern Slavery Portal (“**Portal**”).

The Portal is an interactive system that automates risk characterisations on suppliers, screens the supplier based on publicly available information and issues a questionnaire to the supplier. The supplier data gathered is incorporated into an interactive dashboard, so we can readily analyse our suppliers, track remediation on suppliers (if necessary) and generate reports on suppliers. The Portal is fully auditable, and risks and data generated is used to escalate matters and report to the Board.

All Eldercare suppliers are entered into the Portal. To prevent and mitigate risk, new suppliers must complete the due diligence process early in their engagement.

We approach due diligence in three phasis via the Portal:

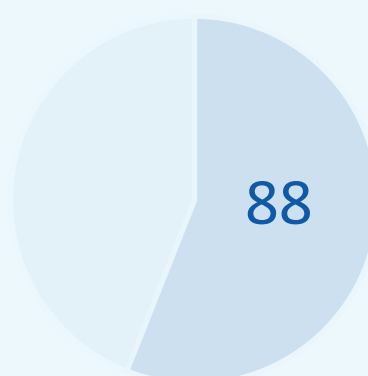
Suppliers risk matrixed



Suppliers screened



Questionnaires issued to high and moderate risk suppliers



1. Risk matrix assessment

All suppliers are risk matrixed considering geographic risk (using resources such as the Global Slavery Index ("GSI")), industry risk, product and service risk and entity risk. Suppliers risk matrixed as high and moderate are prioritised for additional due diligence.

2. Screenings

There are many complex factors which enable modern slavery to persist. The GSI has identified industries and geographical locations at a high risk for modern slavery. We used the GSI as a guide to determine where a supplier was high or moderate risk and should be prioritised for screening.

In combination with the GSI, we used a global analytics database to screen all suppliers against the following key risk areas:

Integrity risks	Corruption and bribery, serious and organised crime, terror, anti-competitive behaviour, government connections, fraud, money laundering, tax non-compliance and sanctions and restrictions
Environment, social and governance risks	Modern slavery, animal welfare, sales and marketing practices, health and safety, human rights, environmental degradation, employment practices, governance and management and regulatory enforcement
Data and cyber risks	Intellectual property, personal data privacy, data security
Operational and quality risks	Industry presence, product and service quality, operational quality and business continuity
Identity risks	Transparency, source of wealth
Financial risks	Financial stability, financial irregularities

If an issue or result is identified, the supplier is prioritised for due diligence.

Suppliers operating within high-risk industries, such as labour hire, cleaning, linen or food, were prioritised for screening based on the labour intensive, low-skilled work associated with these industries. These factors can increase the risk of modern slavery occurring within a supplier's operations.

Similarly, high-risk geographical locations were also prioritised. The GSI has identified countries which have a higher prevalence of modern slavery, with the most common factors shared amongst these countries being conflict, state-imposed forced labour, poor labour laws, corruption and bribery.

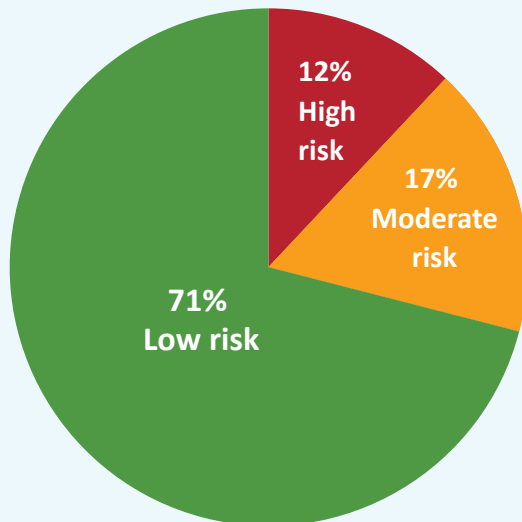
While we recognise that because a supplier operates in a high-risk industry or within a high-risk location does not mean they engage in modern slavery, we prefer to conduct our due diligence with caution and consider all relevant factors in our risk assessment.

3. Questionnaires

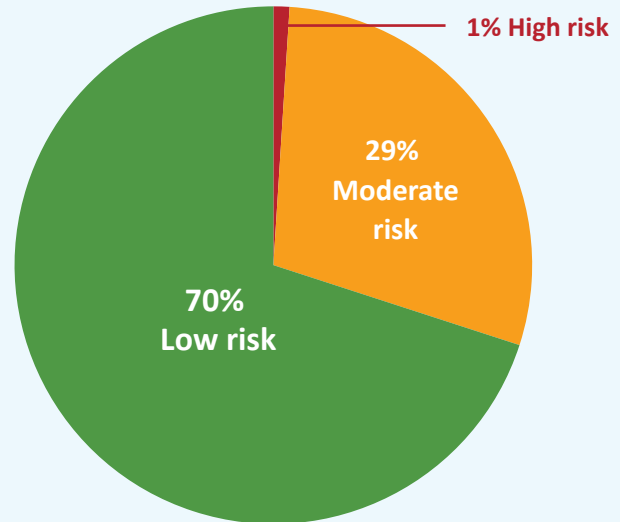
All suppliers identified as high and moderate risk must complete our modern slavery questionnaire. The questionnaire is sent to our suppliers via the Portal, which has automated risk identification and reminders. This is an important tool to allow us to directly liaise with our suppliers to gain an understanding of risk as well as looking deeper into our supply chains. Each supplier that completes a questionnaire has legal analysis to identify risks and any proposed next steps.

The results of our due diligence in the reporting period are set out below.

Results of matrix and screenings

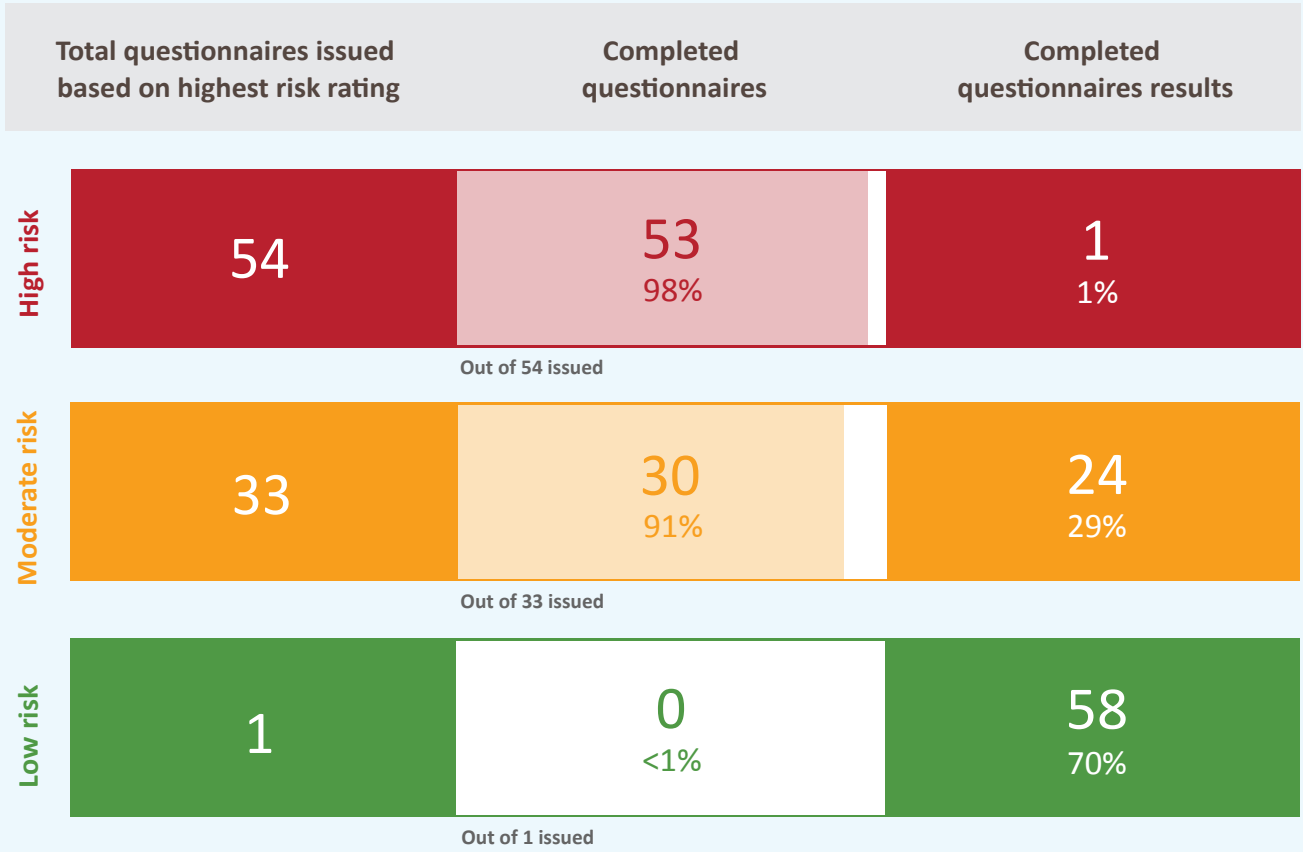


Results of questionnaire



As a result of the due diligence undertaken in the reporting period, the risk profiles of our suppliers has been reduced as set out below.

An important action in the reporting period was ensuring that our suppliers responded to the questionnaire. This included a significant amount of work by our procurement team to directly liaise with suppliers and explain the need to complete the questionnaire. This has resulted in a response rate of 94% as at 30 June 2021 (and at the time of drafting this Statement the response rate has increased).



Annual refreshment

We understand that risk is not static and risk profiles of our supplies can change. Accordingly, we implemented our annual due diligence refreshment program. This involves reviewing our risk matrixing of suppliers, refreshing screenings and issuing a refreshment questionnaire to suppliers.

We also take this opportunity to ask additional questions from our suppliers regarding risk in their suppliers, to identify any issues deeper in our supply chains.

Reporting

Via the Portal, automatic reports are generated as to the status of due diligence on suppliers, any risks identified and any recommendations as to the next steps on suppliers. These reports assist us to quickly identify any potential risks, whilst ensuring that suppliers are completing the due diligence process. These reports also allow us to easily escalate any matters to the Board.

Investments

In addition to the action taken regarding our suppliers, in the reporting period we liaised with our portfolio investment manager to gain an understanding regarding what steps are being taken to address risks of modern slavery within our investment portfolio.

In addition to this communication, we conducted our own independent due diligence on our investment portfolio by conducting screenings on investees. There is a risk that Eldercare is linked to modern slavery via its investments. Given Eldercare's leverage is limited over large multinational entities, Eldercare will continue to liaise with our investment manager to gain an understanding of risk and the steps that are being taken to assess risk through investment arrangements.

Eldercare is also widening its analysis in this respect to consider beyond modern slavery to environmental, social and governance risk.



Remediation

As demonstrated, Eldercare undertook significant actions to assess and identify any risks of modern slavery in its organisation and immediate suppliers. No immediate risks of modern slavery were identified therefore our modern slavery remediation plan was not required to be implemented. However, throughout our due diligence process, we identified that many of our suppliers do not have mechanisms in place to assess their risks of modern slavery.

Our robust systems and processes allow us to approach our suppliers in a bespoke manner depending on what type of risks may present. In the reporting period we had:

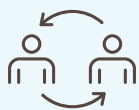


17 trainings issued to suppliers

16 trainings completed



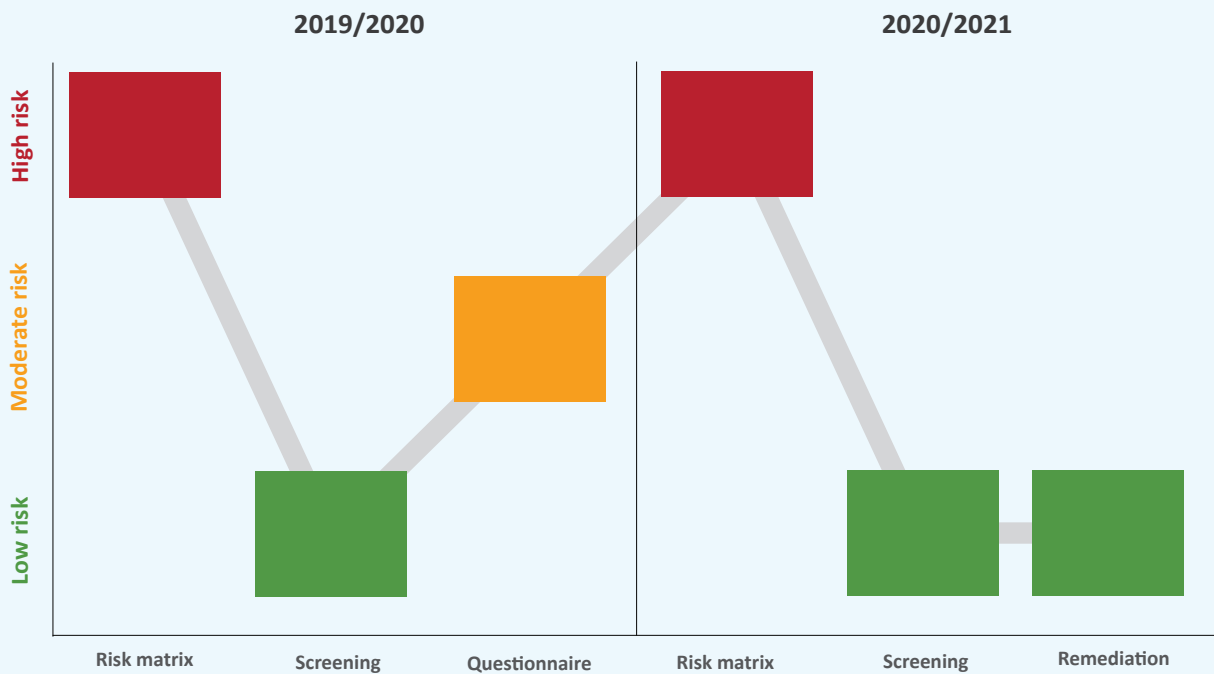
27 suppliers' modern slavery statements assessed



3 suppliers liaised with further

When we liaise with our suppliers directly to enquire about matters identified in their questionnaire, our procurement team does this on an individual manner. In addition to the outcomes described above, in the next reporting period we will be refreshing our due diligence and implementing a site audit program on our suppliers.

To supplement this, tracking of suppliers' risk profiles are tracked via the Portal.



Example

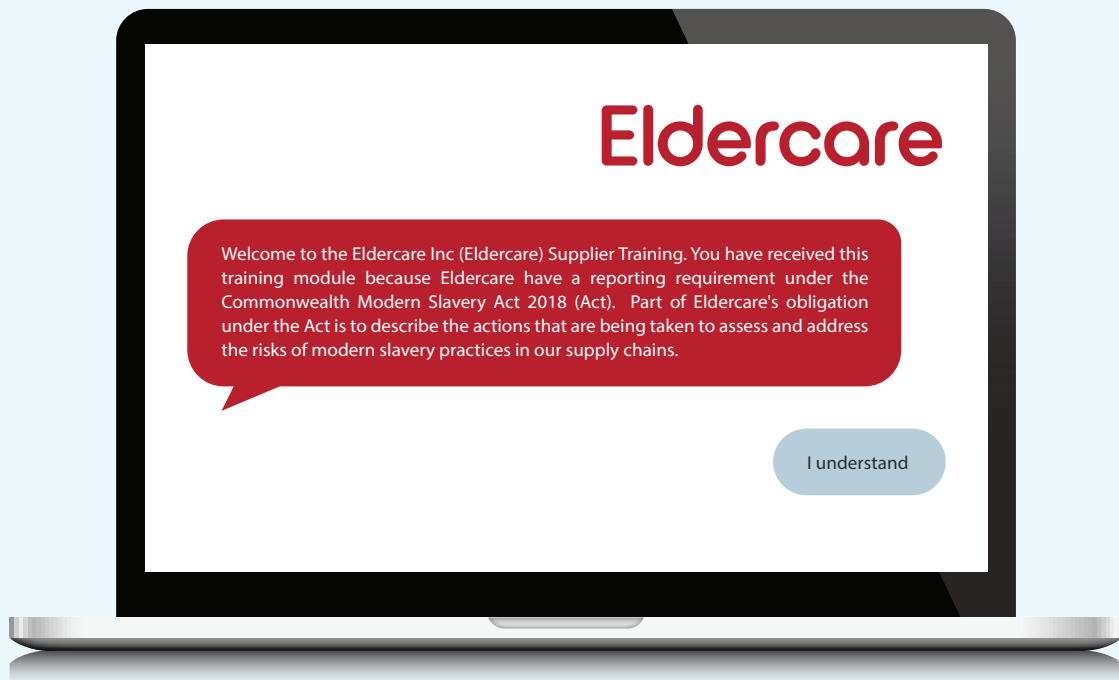
The above graph summarises an individual supplier's movement through the remediation workflow and highlights their risk classification change over time.



Training

In the reporting period, the impact of COVID-19 was continuing, resulting in restricting our ability to conduct face-to-face trainings and courses as planned. However, to ensure that our training program continued, in the reporting period Eldercare launched an interactive employee training module on modern slavery. This interactive training includes employees answering questions regarding identifying risks of modern slavery, reporting and our due diligence procedures.

The personnel at management level and those that engage suppliers were targeted to complete the training in the reporting period. We will continue to evolve and rollout the training further in the next reporting period.



As referred to above, in addition to employee training, we also launched our interactive supplier modern slavery training. We use this training to educate our suppliers. In the next reporting period, we plan to rollout this training to additional suppliers.



Contracts

Eldercare ensures that any third party it is connected with or contracts which are entered, are written into an agreement with us. In the first reporting period we updated our purchase order standard terms and conditions to include a modern slavery clause. For all new agreements entered into, we ensure that there is a modern slavery clause in the agreement.

This clause includes the need for suppliers to conduct due diligence on their suppliers, report any or suspected modern slavery risks to Eldercare and the right for Eldercare to conduct audits.

In the reporting period, we focused on expanding our modern slavery contract clause to existing suppliers on legacy contracts. Any time an existing supplier's contract is due for renewal or extension, we vary the contract to include a modern slavery clause.

Our central oversight of contracting by our procurement team allows us to take a bespoke approach when necessary and vary our standard modern slavery contract clause if risks may present.

Example

Our due diligence process identified a potential new supplier who had historical modern slavery violations and child labour in its supply chains. Notwithstanding that these violations were historical and in relation to different products to that we proposed to procure, we determined that this potential supplier posed increased risks of modern slavery given historical matters. We requested information to gain an understanding regarding the entity's approach to risks of modern slavery as well as proposing a robust modern slavery contract clause, including for example requesting modern slavery risk management plans, requirements for due diligence, reporting, training, and grievance mechanisms.



Audit program

Eldercare implemented an annual modern slavery audit program and plan. This is discussed more in Criteria 5.



Action plan

Eldercare has implemented a process whereby at the commencement of each reporting period, an annual action plan is established. Key projects, initiatives, milestones, and actions are agreed for the upcoming reporting period, with timelines and responsibilities assigned.

This action plan ensures that we are continually evolving and committed to achieving key milestones. It also ensures accountability throughout our organisation.



Criteria 5

Assessing effectiveness of actions

Eldercare understands that we must continually improve our processes and systems, whether our actions are effective and whether our procedures are being followed.

In the reporting period, Eldercare undertook its first modern slavery audit. This audit:

- reviewed systems and processes to ensure all new suppliers were undergoing the due diligence procedure;
- reviewed the number of suppliers that were classified as high and moderate risks and the actions conducted to reduce the risk profile, including training and liaison;
- reviewed the number of employees that completed our modern slavery training module; and
- reviewed the number of contracts that contained our modern slavery contract clause.

This audit was reviewed by the third-party providing us with guidance.

An important aspect of this audit was also to ensure compliance with our Modern Slavery Policy, which sets out the requirements for due diligence.

To continually improve, Eldercare will conduct this annual audit to identify any gaps in our processes as well as seeking to establish key performance indicators and benchmark our performance.

Criteria 6 Consultation

Eldercare does not own or control any other entities such that these criteria do not apply.

Looking forward

Eldercare is proud of the continual action and steps we are taking regarding our modern slavery compliance framework. Eldercare takes genuine actions to assess risk and will continue our journey to identify risk. We have set the following key actions for FY22:



Continue supply chain mapping, with analysis deeper in our supply chains

Implement site audit program



Identify risk with our tier 2 suppliers

Expand our training program



Conduct a policy and code review

Annual audit, key performance indicators



Continue our due diligence framework

Benchmarking ourselves and our suppliers



This modern slavery statement for the reporting period was approved by the Board of Eldercare.

Signed



Mr James Lawes
Board Chair
26/10/2021

