

ANNEXURE – MODERN SLAVERY STATEMENT

1 Introduction

Brightwater Care Group Limited ACN 612 921 632 (**Brightwater**) is subject to the *Modern Slavery Act 2018 (Cth) (Act)*.

What is modern slavery?

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom

The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

Where Brightwater refers to ‘modern slavery’, this is intended to cover the range of slavery and slavery-like practices that fall within the Act’s definition of the term.

Scope and purpose

As a reporting entity under the Act, Brightwater is required to prepare an annual Modern Slavery Statement (**Statement**) that identifies modern slavery risks in our supply chain and the actions taken to address those risks.

In addition to satisfying the reporting requirement under the Act, this Statement reflects a stance on modern slavery that is reflective of Brightwater’s Mission and Values.

2 Brightwater structure, operations and supply chain

This Statement has been prepared for Brightwater Care Group Limited ACN 612 921 632, of registered office Level 3, 355 Scarborough Beach Road, Osborne Park, WA 6017 (**Brightwater**).

Brightwater is a public company limited by guarantee and registered under the *Corporations Act 2001 (Cth)*.

We have approximately 2051 staff members, supplemented by approximately 550 volunteers.

Brightwater is not part of a larger corporate group and does not own or control other entities. Brightwater is, however, organised into business units whose activities fall into several distinct areas; namely:

- At home care;
- Residential aged care;
- Disability support services;
- Retirement living;

- Dedicated research centre; and
- A commercial branch, offering linen and catering solutions internally, and to other care facilities, hospitals, hotels, and the resources sector.

Brightwater procures a range of goods and services necessary to support the above activities. The main services we procure are those performed by our workforce, consisting of the employees and contractors who perform various roles in the delivery of care and support to our clients. The main goods we procure are consumable items used in the course of providing care and support to our clients. These are manufactured across the world.

Brightwater works with a network of suppliers, subcontractors and agents, most of whom are located in Australia. As a result, a high percentage of our direct spend is within Australia; though our suppliers do often have further suppliers of their own.

3 Risks of modern slavery practices in our operations and supply chain

We do not consider that there is a significant risk of Brightwater directly causing, contributing to or being linked to modern slavery practices.

Most of the individuals who make up Brightwater's workforce (whether employed or contracted) are engaged by us in accordance with our documented recruitment and human resources policies. The majority are Australian citizens, permanent residents or working on visas. Where we use agency staff to supplement our workforce from time to time, we source them only from reputable agencies.

Brightwater does not knowingly purchase any goods that could be connected with modern slavery practices, though we acknowledge there can be limitations in our practical ability to scrutinise the supply chains of parties who supply goods to us.

In Brightwater's view, the greatest modern slavery risks associated with our business are likely to arise in the following main areas:

- Purchase of goods manufactured overseas, including:
 - medical and healthcare equipment manufactured overseas;
 - technology;
 - commercial and catering consumables; and
 - Brightwater Linen.

Impact of COVID-19

During the 2019-2020 financial year, COVID-19 has had an incalculable impact on all aspects of Brightwater's business.

Brightwater recognises that the ongoing pandemic has had numerous adverse effects on vulnerable workers secondary to factory shutdowns, order cancellations, workforce reductions and sudden changes to a company's operations. Global supply chains have been severely disrupted, and this has exacerbated the risks of modern slavery practices occurring in these supply chains.

The COVID-19 pandemic has had two notable impacts on Brightwater's purchasing of goods through supply chains which it has identified as being at an elevated risk of modern slavery, namely the purchase of personal protective equipment (PPE) and catering consumables and packaging.

Brightwater has required a greater volume of PPE than previously as part of its effort to mitigate against the potential spread of COVID-19. This increased demand has also coincided with a greater global demand for PPE. Brightwater has been required to engage with a broader range of suppliers than in previous years in order to source the PPE required to continue its safe operation.

As part of its COVID-19 preparedness efforts, Brightwater's catering business was required to prepare 60 days of frozen meals for 700 clients. This necessitated the purchase a significant volume of catering consumables and packaging to support this work.

Brightwater is cognisant that COVID-19 has intensified the global power imbalances which contribute to modern slavery and remain committed to doing its part to redress these issues.

4 Actions to assess and address risks (including due diligence and remediation processes)

Brightwater is committed to good corporate governance, transparency and accountability. We are committed to operating our business lawfully, ethically and with honesty and integrity.

Our Mission ('pursuing the dignity of independence') and our Values ('care', 'learning', 'innovation' and 'people') underpin everything that we do.

Brightwater will:

- not engage in modern slavery;
- not condone the presence of modern slavery in Brightwater's supply chain;
- take such reasonable steps as may be available (including exerting commercial influence and using alternate supply/distribution channels) to avoid the presence of modern slavery in Brightwater's supply chain; and
- exercise due diligence to maximise compliance with this Policy, and generally avoid contributing to the global issue of modern slavery.

At an individual level, it is the responsibility of each director, officer, employee, agent, contractor and other party acting or purporting to act for or on behalf of Brightwater to know and follow the ethical, legal, and policy requirements that apply to their roles. Our policy position on modern slavery must therefore be followed to the extent relevant to a person's role at Brightwater.

Brightwater's actions to assess and address modern slavery include:

- **Modern Slavery Working Group:** This group will coordinate Brightwater's modern slavery response on an ongoing basis.
- **Standard contracts:** Changes to our standard supplier agreements will be introduced, to reflect Brightwater's stance on modern slavery.
- **Code of Conduct:** This will be developed, and supplied to new suppliers.
- **Tender process:** Change to our tender process will be introduced to assess potential tenders against compliance with the Act and processes for addressing modern slavery risks.
- **Guidance materials:** General information on modern slavery and Brightwater's policy position will be prepared and provided to relevant new and existing staff in key risk areas.
- **Policies, Procedures and protocols:** Brightwater is reviewing how we do business, to the extent appropriate to address identified risks. For example:
 - When purchasing, we require our suppliers to comply with all applicable laws – which includes modern slavery laws, employment laws and workplace laws. We endeavour to work only with suppliers who are aligned to our Values. Further, where we identify that a particular purchase comes with heightened risk, we will request additional information and undertake additional risk assessment.

Remediation may take many forms. We have a designated point of contact for modern slavery complaints and concerns.

Wherever there are concerns about modern slavery within the Brightwater supply chain, it is important to raise this with us directly in the first instance, so that we may have an opportunity to remedy the situation. There are many ways for staff, our clients and the public to contact us. We also have a Whistleblower Policy that can help encourage reporting.

Where problems are identified and cannot be remediated, we will be prepared to terminate supply contracts and/or switch to alternate suppliers.

5 Assessing the effectiveness of our actions


Brightwater assesses the effectiveness of our actions using qualitative and quantitative methods, such as:

- including modern slavery risks in our risk register, as appropriate;

- gradually implementing modern slavery clauses in the agreements, we enter into with our suppliers, and recording these in our contract management system;
- maintaining a modern slavery Working Group; and
- monitoring the number of modern slavery complaints or concerns we receive (if any).

6 Approval

This statement was approved by the full Board of Brightwater Care Group Limited on 16 December 2020.



David Craig
Chairman

