

# MODERN SLAVERY STATEMENT

Financial year 1 July 2023 – 30 June 2024



## About SASH

Section 16 (1)(a) of the Act

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At SASH, we acknowledge we have both a legal and a moral responsibility to promote transparency in our operations and implement procedures that minimise the chances that modern slavery practices could exist within the business and broader supply chain. We are committed to improving our practices to identify and address modern slavery.

This Modern Slavery Statement (**Statement**) is made on behalf of the SASH Group<sup>1</sup> pursuant to sections 14 and 16 of the *Modern Slavery Act 2018* (Cth) (**the Act**). SASH has an annual consolidated revenue in excess of \$100 million in the financial year from 1 July 2023 to 30 June 2024.

This Statement covers the reporting period from 1 July 2023 to 30 June 2024 and addresses the mandatory reporting criteria, as required by section 16 of the Act, setting out the actions we have taken to assess and address the potential modern slavery risks in our operations and our supply chains in line with our broader risk management framework.

SASH is one of Australia's leading veterinary hospital networks, providing a broad range of specialist and emergency veterinary care for dogs, cats, and other companion animals. At SASH, we believe that the highest standards in veterinary care are achieved when clinical expertise is delivered by compassionate, motivated people in a caring and supportive environment. This is embodied by the dedicated teams providing around the clock emergency care and a wide range of specialist referral services at our hospitals.

Since first opening our doors in 2007, we have pursued the vision of our founding partners to offer a multi-disciplinary service providing expertise across the spectrum of veterinary specialties. To meet the increasingly sophisticated needs of our patients, we have also enhanced our critical in-house support services, including specialist anaesthesia, critical care, diagnostic imaging, and pathology.

With further advances in technology and understanding, the depth and breadth of the services and facilities available at SASH will continue to evolve, in fulfilment of our purpose to help pets and their families live their best life.

## Structure, operations and supply chain of the entity

Section 16(1)(b) of the Act

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### Structure and operations

SASH is one of the largest veterinarian-owned and operated specialist and emergency veterinary hospital networks in Australia.

To operate its business, SASH employs team members in hospitals that are supported by group services.

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<sup>1</sup> This Modern Slavery Statement is made by each of the entities set out in Appendix 1 (each an included entity and together the SASH Group, we, us and our) and is submitted in accordance with the Modern Slavery Act 2018 (Cth). SASH HoldCo Pty Ltd is the ultimate holding company with either full ownership, majority ownership or controlling interest in each of the SASH Included Entities. Collectively all the entities in the SASH group are referred to as SASH or the SASH Group.

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In its hospitals, SASH employs people as (but not limited to):

- Registrar & Specialist Veterinarians
- Intern & Resident Veterinarians
- Emergency & Hospital Care Veterinarians
- Allied Health Professionals
- Veterinary Nurses
- Hospital Attendants & Cleaners

SASH Group Services includes, but is not limited to, roles in marketing, finance, IT, procurement, people & culture and operations.

SASH provides services within Australia. As such, all our team members are based in Australia. From time to time, employees from SASH may work remotely, including from overseas.

## Risks of modern slavery practices in the operations and supply chains, and any entities the Business owns or controls

Section 16(1)(c) of the Act

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### Employment

SASH considers that it has a low risk of directly causing or contributing to modern slavery practices related to its own team members. The SASH workforce is employed directly by SASH entities under awards, and contracts. SASH engages independent contractors from time to time for specific veterinary skills as required. SASH does not use external labour hire agencies.

SASH has a People & Culture team which oversees the terms and conditions of employment with SASH to ensure compliance with Australian workplace laws, including the *Fair Work Act 2009 (Cth)*, work health and safety legislation and other legislation pertaining to employment. SASH is confident there are no modern slavery practices within operations directly under its control.

### Procurement of goods and services

SASH purchases goods and services from suppliers who are almost exclusively Australian based. SASH engages with these suppliers for the purchase of hospital equipment, pathology services, office supplies, pharmaceuticals and uniforms.

These suppliers are based in Australia, however some of their products and services may be, partly or wholly, manufactured in other countries in the Asian, North American and European regions.

Some of the potential risks that may arise in SASH's suppliers' supply chain are identified below:

- Team members working for a supplier may not receive their relevant minimum conditions
- Subcontracting of labour, whose working conditions are not visible to our suppliers
- High risk geographical locations for the manufacturing of uniforms

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- Migrant labour exploitation
- Poor visibility over long and complex supply chains

Most of SASH's larger suppliers have issued their own Modern Slavery statements. SASH's animal-health technology and veterinary diagnostics suppliers have up to date and robust modern slavery statements. For these reasons, SASH believes the risks of modern slavery are being assessed by its suppliers and action is being taken.

SASH recognises that it cannot definitively ensure that there are no risks of modern slavery that may exist within its supply chain network. This is because SASH does not have the same level of oversight over its suppliers that it can exercise over its own team members and operations.

## Actions by SASH to assess and address those risks, including due diligence and remediation processes

Section 16(1)(d) of the Act

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### Employment

SASH has multiple levels of regulation that apply to the engagement of its team members as described below:

#### *Modern Awards*

Team members may be covered by modern awards, including but not limited to, the *Animal Care and Veterinary Services Award 2020* and the *Miscellaneous Award 2020*.

SASH ensures that team members receive at least the minimum entitlements under the applicable modern award including the minimum rates of pay for their applicable classification and annual leave, personal / carer's leave, shift allowances, overtime and weekend penalty rates etc, as they apply to its operations.

SASH is currently in the process of implementing a new people system to support all processes related to hiring, onboarding and paying its team members. The implementation process has resulted in a detailed and exhaustive review of our pay rules and people practices. Any anomalies have been addressed and SASH is confident that we are compliant with the relevant modern awards and relevant employment legislation.

#### *Other Team Members*

For team members who are not covered by a modern award, SASH is aware that it must pay at least the federal minimum wage to these team members for each hour worked and ensure that the terms of the national employment standards (NES) are applied to their employment and not in any way undermined.

Many team members at SASH are paid above the relevant modern award and federal minimum wage base rates. This is to ensure SASH is able to employ the most highly skilled people in the industry to provide our specialist services.

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SASH also has the relevant systems and processes in place to ensure matters such as taxation, superannuation, workers compensation and all other statutory and contractual entitlements are properly attended to. SASH regularly engages with external legal advisors to ensure it is meeting its various legal obligations.

## Procurement of goods and services

SASH has had regard and consideration of its suppliers' modern slavery statements to better understand their risks.

SASH is committed to continually reviewing engagement with suppliers to identify and assess modern slavery risks within its operations and the operations of its supply chain to the extent it is reasonably able to.

Since our last statement, SASH has introduced a policy that discourages wide-spread gifting of physical goods within our organisation to minimise the risk of sourcing goods from non-compliant suppliers.

## How SASH assesses the effectiveness of such actions

Section 16(1)(e) of the Act

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SASH acknowledges the importance of assessing the effectiveness of its actions.

As part of its future actions, SASH will continue to review and improve its risk management procedures for modern slavery as well as encourage the reporting and monitoring of such risks.

## Employment

SASH employs a payroll specialist to ensure that all team members are being paid at least the appropriate minimum rates of pay as well as, but not limited to, the applicable overtime and penalty rates, allowances, loadings.

SASH also seeks external legal advice from specialist employment lawyers to ensure that its team members receive the correct entitlements.

These are effective to the extent that very rarely does SASH have any issues around the underpayment of its people or complaints about the non-payment of other entitlements such as annual leave, long service leave, etc.

## Procurement of goods and services

SASH undertakes to increase scrutiny to address the modern slavery risks of its suppliers.

## Process of consultation between SASH entities

Section 16(1)(f) of the Act

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For consultation purposes, SASH's included entities all report into SASH Holdco Pty Limited (ABN 91 616 570 560).

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SASH has common directorship across the entities, including a single Chief Executive Officer. The Chief Executive Officer is responsible for all of SASH and sits on the SASH Board.

This Statement has been reviewed and approved by the directors of SASH on behalf of all entities. The development of this Statement was done in consultation with and input from Directors of SASH entities and the SASH Group Leadership Team.

## Further information

Section 16(1)(g) of the Act

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### Future Commitments

SASH is committed to ongoing work on its systems and controls to assess and manage modern slavery risks in our operations and supply chains. As part of its strategy for the coming reporting period, SASH is committed to the continued monitoring of risks. SASH is also committed to encouraging the reporting and investigating of modern slavery risks across its operations and its supply chain.

Additionally, other actions likely for the coming financial year include:

- Increasing awareness among SASH suppliers of our ethical business practice expectations.
- Updating our Whistleblower policy to ensure inclusion of protections for any notifications of modern slavery act breaches.
- *Increasing team member awareness particularly aimed at persons within SASH making purchasing decisions and those involved in tender processes.*
- Publishing our Modern Slavery policy and sharing this policy across the organisation and to external stakeholders via our website.

SASH recognises the importance of developing and implementing a model of continuous improvement by assessing and addressing risks stemming from our business.

SASH understands internal systems and processes need to be regularly reviewed and improved to effectively mitigate against risks of modern slavery.

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This Statement was approved by the Board of SASH after consultation and input from all SASH entities. This statement is approved by the Reporting Entity on behalf of all SASH entities.

A handwritten signature in blue ink, appearing to read "J Tomlinson", is written over a horizontal line.

Jamie Tomlinson

Chair

Date: 19 December 2024

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## APPENDIX 1

### REPORTING ENTITY

SASH Holdco Pty Limited ABN 91 616 570 560

#### Included Entities

Small Animal Specialist Hospital Pty Ltd ABN 25 612 976 315

SASH CC Pty Ltd ABN 62 613 557 672

ADM Sydney Pty Ltd ABN 61 126 292 804

SASH Western Sydney Pty Ltd ABN 70 653 279 746

SKTV Pty Ltd ABN 57 644 798 130

SAVSEH Pty Ltd ABN 60 654 298 692

SPVH Pty Ltd ABN 90 664 588 630