



Modern Slavery Statement FY 24/25

Prepared in accordance with the Modern Slavery Act 2018 (Cth)



Message from the Managing Director and CEO

19 December 2024

Dear Stakeholders,

TLC Healthcare is pleased to publish its Modern Slavery Statement for the 2024/25 financial year.

As a leading provider of aged care, healthcare, and community services across Victoria, our highest priority is the wellbeing of our residents, patients, employees, and the communities which we serve. We are acutely aware of the global and local implications of modern slavery and human trafficking. Accordingly, we remain steadfast in our commitment to eliminating these practices from our operations and supply chains.

TLC Healthcare supports the objectives of the *Modern Slavery Act 2018* (Cth), and has implemented comprehensive measures to identify, address, and mitigate risks of modern slavery within our business and supplier networks.

Guided by our core values of care, respect, and integrity, we have established robust policies, governance frameworks, and supplier engagement strategies to ensure ethical practices are upheld.

In this year's statement, we outline our ongoing efforts, including detailed risk assessments, supplier audits, employee training programs, and collaboration with high-risk suppliers in regions such as Vietnam. Our approach emphasises transparency, accountability, and continuous improvement to protect the most vulnerable individuals in our workforce and supply chains.

We would like to extend our gratitude to our employees, suppliers, and stakeholders for their dedication and cooperation in this important mission. By working together, we can take meaningful steps to eradicate modern slavery and contribute to a fairer and more just society.

We welcome your feedback on this statement and look forward to continuing our shared commitment to ethical and sustainable practices.

Sincerely,

Lou Pascuzzi
Chief Executive Officer & Managing Director
TLC Healthcare



Criteria One and Two:

Identify the reporting entity and describe its structure, operations and supply chains.

Reporting Entity

This Modern Slavery Statement is issued by **TLC Healthcare ABN 20 090 724 726 ('TLC')**, a leading provider of aged care, healthcare, and other commercial, community services across Victoria, Australia.

TLC is committed to the highest standards of ethical conduct, and to ensuring that slavery, human trafficking, and exploitation, does not occur in our business operations or supply chains. We acknowledge the significance of modern slavery as a global issue and are committed to taking active steps to prevent it within our healthcare services and the wider network of suppliers, contractors, and partners.

Structure and Operations

TLC operates 12 healthcare facilities and precincts, including aged care homes, medical centres, early learning centres, and health clubs. Our workforce consists of 2293 employees and contractors operating primarily in Victoria.

TLC's mission is to deliver integrated healthcare solutions that support residents, patients, and the wider community.

Supply chain

TLC engages with a diverse supply chain, consisting of 1200 contractors across the following key sectors:

- Health supplies and medical equipment;
- Corporate services, including information technology, recruitment, and professional consulting;
- Building and property management services, including utilities, waste management, security, gardening, equipment purchases, capital & property development works, and investment advisers;
- Hospitality services, including food services, catering, cleaning, laundry, pharmacy & hospitality supplies;



- International procurement, with a focus on manufacturing hubs, particularly in Vietnam and other regions with identified risks.

TLC recognises that some of our suppliers operate in high-risk geographies and sectors, necessitating robust risk management and oversight.

Criteria Three:

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.

TLC assesses modern slavery risks based on geographical location, industry sectors, and supplier practices. Our key risk areas include:

Risk Area	Description	Risk Level	Actions Planned
Geographical Risks	Engagement of suppliers in regions with weaker regulatory frameworks or enforcement of labour laws e.g., Vietnam, and other manufacturing hubs TLC may engage in the future. Factories in Vietnam also may source raw materials from high risk regions with limited oversight of the respective labour practices.	High	Annual supplier & factory visits, payroll audits.
Outsourced Labour	Use of third-party labour hire agencies in Australia and abroad, which may involve subcontracting chains with inadequate oversight.	Medium	Conduct detailed background checks on agencies.
Goods Manufacturing	Potential reliance on forced or underpaid labour in manufacturing processes for medical equipment and uniform.	High	Implement anti-slavery clauses in contracts.



Information Technology Hardware Supply Chain	Procurement of hardware or software from suppliers with complex and opaque supply chains in high risk regions.	Medium	Issue supplier self-assessment questionnaires.
Health Sector Recruitment	High use of international recruitment and potential dependence on labour-hire agencies for staffing, increasing risks of underpayment, visa concerns, coercion or exploitation.	Medium	Ensure compliance with fair recruitment practices.

TLC also identifies domestic vulnerabilities, such as domestic violence impacts on employees, which intersect with labour risks. These are managed through Enterprise Bargaining Agreement provisions and internal support mechanisms.

Criteria Four:

Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes

Governance and Accountability

TLC have robust governance structures in place to oversee TLC’s modern slavery compliance framework and to ensure accountability at all levels of the organisation.

The TLC Board of Directors, which includes the Chief Executive Officer and independent directors, is responsible for overseeing TLC’s modern slavery initiatives. This includes approving the representations herein, reviewing progress and identifying areas for continuous improvement.

Reports are also provided to the Board every 2 months detailing the then current risk management strategies.

TLC also takes a collaborative approach to modern slavery risk management. There is a cross-functional collaboration between the Legal, Procurement, and Quality & Risk teams that ensures modern slavery considerations are embedded across all business processes.



Policies and Procedures

We have a range of policies and procedures in place to help identify and mitigate modern slavery risks, including:

- **Supplier Contracts:** All suppliers are encouraged to use TLC's standard Goods and Services Agreement, which includes provisions prohibiting any form of modern slavery. TLC's Goods and Services Agreement ensures suppliers adhere to ethical labour practices throughout their operations.
- **Anti-Slavery and Human Trafficking Policy:** This policy reflects our commitment to preventing modern slavery and sets out the processes for identifying, assessing, and managing risks associated with modern slavery.
- **Code of Conduct:** Our code of conduct applies to all employees, contractors, and suppliers, and emphasises the importance of respecting human rights and upholding ethical standards.
- **Supplier Code of Conduct:** Our supplier code of conduct sets out clear expectations for our suppliers regarding labour practices, including the prohibition of forced labour, human trafficking, and child labour.

Due Diligence and Risk Assessment

As part of our commitment to preventing modern slavery, we conduct thorough due diligence on our suppliers and business partners. These include:

- **Supplier Audits:** We regularly audit and review our supply chain to ensure compliance with our ethical standards; and
- **Risk Assessment:** We assess the risk of modern slavery in our supply chains, particularly in high-risk areas, and take appropriate actions to mitigate those risks.

TLC conduct due diligence during the onboarding of new suppliers and regulatory audits of existing suppliers, to identify any potential risks of modern slavery. This includes background checks of supplier company's and reviewing the supplier's applicable policy and procedures. Specifically:

- **Aged Care Act 1997 Compliance:** Mandatory police check and statutory declarations for aged care employees and suppliers working onsite at the residential aged care facilities. This documentation ensures that no persons who have committed criminal offences, including those relating to exploitation, trafficking, and slavery, are engaged in the TLC workforce.



Supplier Engagement

TLC also host regular networking events for both its international suppliers and local suppliers, to foster transparency and collaboration on ethical practices in high risk and low risk regions. These events include the TLC Supplier Christmas Luncheon hosted in Melbourne for Australian suppliers, or the TLC Supplier Dinner hosted during the annual visit to Vietnam.

Other Supplier Engagements include:

- **Annual Factory Visits:** TLC Executives and Managers conduct annual visits to suppliers in high risk regions, predominantly being TLC Health Supplies' manufacturing partners in Vietnam, to assess the working conditions and labour practices.
- **Access to Payroll Data:** TLC work closely with key supplier in Vietnam to access its payroll data, ensuring factory workers are paid fairly and in compliance with local wage laws.

Training and Awareness

- **Employee Training:** We provide regular training to our employees, especially those involved in procurement and supply chain management, to raise awareness of modern slavery risks and ensure they understand the procedures for reporting any concerns.
- **Supplier Education:** Suppliers are educated on TLC's expectations regarding ethical practices and compliance with modern slavery legislation through TLC's Goods and Services Agreement.

Remediation Plans

- **Whistleblower Policy:** We have established a whistleblowing policy that encourages employees, suppliers, and other stakeholders to report any concerns regarding modern slavery or human trafficking without fear of retaliation.

The Whistleblower Policy is accessible on TLC's internal Document Management System, or on the [TLC Healthcare Website](#). Reports are escalated to the TLC Chief Legal Counsel and the Board for action.

- **Corrective Actions:** In cases where modern slavery risks or breaches are identified, TLC implement corrective action plans, which may include formal apologies, supplier training, or termination if necessary.



Audit and Risk Management

Regular reports are prepared for the TLC Quality & Risk Team, outlining the steps taken to mitigate modern slavery risks and the results of ongoing initiatives. The current actions taken to report on our modern slavery risks include:

- The review and updating of our Supplier Code of Conduct;
- Implementation of a new training module on identifying and addressing modern slavery;
- Collaborated third-party organisations to monitor supply chain standards;
- **Spot Checks:** High risk suppliers in Vietnam are subject to periodic annual spot checks to verify compliance with contractual and legal obligations; and
- **Contract Reviews and Document Management System:** All new supplier contracts are reviewed by the TLC Legal Team and stored in the document management software, Plexus, to ensure modern slavery clauses are included in contracts not provided by TLC.

Criteria Five:

Describe how the reporting entity assesses the effectiveness of the actions being taken to assess and address the risks of modern slavery practices in its operations and supply chains.

TLC Healthcare measures the effectiveness of its modern slavery initiatives using the following Key Performance Indicators:

- **Supplier Compliance:** Number of suppliers meeting modern slavery requirements.
- **Training Coverage:** Percentage of staff and suppliers trained in modern slavery risk management.
- **Remediation Outcomes:** Number of corrective actions implemented successfully.

TLC utilises Plexus, a contract management software, to monitor contract compliance and ensures continual improvement through regular reporting to the Quality & Risk Team.



Criteria Six:

Describe the process of consultation with

- (i) any entities that the reporting entity owns or controls;**
- (ii) and in the case of a reporting entity covered by a statement under section 14 – the entity giving the statement.**

TLC consulted internally across all business functions, including, but not limited to:

- Legal Team
- Procurement Team
- Quality & Risk Team
- Board of Directors
- General Management Team
- All staff through staff communication avenues

This consultation ensured alignment across our governance framework. The Board of Directors, including independent members, approved this statement and provided oversight of TLC's modern slavery initiatives.

Criteria Seven:

Include any other information that the reporting entity, or the entity giving the statement, considers relevant.

TLC recognise that addressing modern slavery is an ongoing process and are committed to continuous improvement in practices and policies. Key future commitments include:

- **Comprehensive Supply Chain Mapping:** Over the next reporting period, TLC will undertake detailed mapping of its supply chain to identify high risk areas and improve visibility into sourcing practices.



- **Enhanced Supplier Engagement:** TLC will strengthen its engagement with suppliers by providing additional resources and support to ensure compliance with modern slavery legislation.
- **Stakeholder Collaboration:** TLC will explore partnerships with industry groups and NGOs to share best practices and leverage collective efforts in eradicating modern slavery.

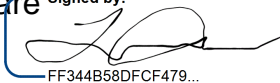
TLC Healthcare is committed to taking a proactive approach to combat modern slavery and human trafficking. We will continue to monitor, review, and improve our efforts to ensure that we maintain a transparent and ethical supply chain and business operations. We believe that by working together with our suppliers, employees, and stakeholders, we can help eradicate modern slavery in our sector.

Approval and Sign-off

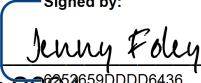
This Modern Slavery Statement was approved by the TLC Healthcare Board of Directors on 19/12/2024.

This Modern Slavery Statement will be reviewed annually. Stakeholder feedback is welcomed to improve TLC's approach to modern slavery compliance.

Lou Pascuzzi
Chief Executive Officer & Managing Director
TLC Healthcare

Signed by: 
Signature: _____
Date: 19 December 2024

Jenny Foley
Chief Quality & Risk Officer
TLC Healthcare

Signed by: 
Signature: _____
Date: 19 December 2024