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# IRT Modern Slavery Statement 2022

# Statement by the Chair and CEO

As a leading not for profit provider of aged care services, our approach to modern slavery is based on our values of Integrity, Respect and Trust. We are very aware of the need to protect the most vulnerable members of our society by ensuring that our processes identify potential risks in our supply chains and where necessary, establish remediation plans.

Our modern slavery statement for 1 July 2021 – 30 June 2022 has been endorsed by the IRT Board of Directors.



**Mike Halloran**

Chair



**Patrick Reid**

CEO

# Reporting entity, structure, operations and supply chains

Illawarra Retirement Trust ACN 000 726 536 (“IRT Group”) is an Australian public company limited by guarantee. It trades under a number of registered business names including IRT Aged Care Centres, IRT Retirement Villages, IRT Home Care, IRT Catering, IRT Academy and Age Matters.

IRT Group is one of Australia’s largest community based seniors’ lifestyle and care providers with over 2,200 employees. It operates throughout New South Wales, Australian Capital Territory and Queensland and has its headquarters in Wollongong NSW.

Our mission is to create communities where seniors achieve their optimum quality of life. We’ve been delivering on this for more than 50 years.

As a public benevolent institution, IRT Group returns profits to the community through customer benevolence, grants and advocacy programs.

Our main operations include:



19 Aged Care Centres



29 Retirement Villages



Home Care Services



Catering business



Registered training organisation  
IRT Academy



Charitable foundation  
Age Matters

All of our operations are based in Australia.

We predominantly procure products and services from the following categories of supply chain:

- healthcare/medical services, equipment and consumables, including allied health professionals;
- cleaning supplies and suppliers;
- food and related consumables, and
- construction and facilities management/maintenance.

# Risks of modern slavery practices in IRT Group operations and supply chains

IRT Group recognises that modern slavery is a crime which exploits human victims and which can take many forms including slavery, servitude, forced labour and human trafficking. We have a zero tolerance approach to causing, contributing to, or being directly linked to, modern slavery practices.

We have a strong focus of safety for our employees, contractors and volunteers. Most employees are recruited through online advertising, employee referral and other proactive searches by our internal recruitment team.

With our operations based in Australia and our workforce predominantly employed under an Enterprise Agreement, the risk of IRT operations directly causing or contributing to modern slavery practices is low.

We have identified that we may cause, contribute to, or be linked to modern slavery practices through our supply chain arrangements. We have identified our top suppliers (by spend) and assessed the risk of modern slavery practices based on a number of risk factors including:

- Supplier country of operation – we recognise that suppliers may operate in countries with a higher risk of modern slavery practices.
- Supplier category – some industries are recognised as having a higher incidence of modern slavery.
- Workforce – suppliers that operate with a contingent workforce can have a higher risk of modern slavery.





## **Actions taken to assess and address risks of modern slavery practices in IRT Group operations and supply chains, including due diligence and remediation processes**

During the year we undertook a survey of our Tier 1 strategic suppliers to ascertain:

- Which of our suppliers are required to report under the Modern Slavery Act and requested their statements;
- Their awareness of modern slavery concepts;
- Whether they have policies and processes in place with regards to modern slavery risks in their supply chains;
- Whether they have a person or team in their organisation for overseeing modern slavery risks (including record keeping regarding contractors and subcontractors).

Tier 1 suppliers are those that we contract directly to. Those surveyed provide a range of products and services including food and medical supplies; allied health and healthcare recruitment; cleaning and construction; marketing supplies and uniforms.

It is acknowledged that modern slavery risks are not only present in Tier 1 and that to limit ourselves to Tier 1 we may become complicit in modern slavery ourselves. In using the information from the survey results, we are aiming to identify which suppliers we will work further with to identify modern slavery risks in their supply chains.

We received a 50% response rate to the survey and were generally satisfied with the responses from our suppliers who provided us with assurance that they are aware of and are managing their modern slavery risks. However, there were suppliers from a number of categories that did not respond and we believe that a more direct approach with them may gain us further insight for FY23.

These include:

- Hospitality, healthcare, hygiene, cleaning and safety products
- Medical supplies
- Healthcare recruitment
- Cleaning and facility management services
- Uniforms.

In relation to our relationship with our suppliers more generally:

- Our revised Supplier Annual Declaration and Purchase Order Terms and Conditions require all suppliers to assure us that they have taken reasonable steps to assess and address potential modern slavery risks in their operations and supply chains.
- We strive to build supportive, transparent and collaborative relationships with suppliers and clearly communicate our expectations to them.

IRT's whistleblowing policy (the Reporting of Wrongdoing Policy) provides a framework to deal with any reports of suspected modern slavery practices within IRT. The policy applies to current and former employees, volunteers, directors, officers, contractors and suppliers of IRT, and their relatives and dependents who are all eligible to be disclosers.

# How IRT Group assesses the effectiveness of the actions being taken to assess and address risks of modern slavery practices in its operations and supply chains

IRT Group will assess the effectiveness of its actions to identify, evaluate and assess modern slavery risks by:

- reviewing and reporting on issues raised through our Reporting of Wrongdoing (Whistleblower) Policy
- including consideration of modern slavery risks in internal audits
- continuing to collaborate with our suppliers and determining their awareness of modern slavery risks
- conducting regular reviews of our supplier expenditure data to ensure that we identify emerging risk areas
- conducting an annual review of our response to modern slavery
- conducting regular review of our policies and procedures, which includes those that relate to modern slavery risk

Consistent with the Modern Slavery Act, the Board of IRT will review the organisations actions to address modern slavery risk and approve the annual Modern Slavery Statement.

## Other information which IRT Group considers relevant

IRT Group is committed to acting ethically and with integrity in all our relationships. This commitment includes the protection of human rights and lawful, fair and ethical work practices.

We expect our service providers, suppliers and contractors to share this commitment to ensure that modern slavery is not taking place in their organisations or within their own supply chains.