

# RSL LIFECARE LIMITED

ABN 43 000 048 957

## MODERN SLAVERY STATEMENT 2021-22



RSL LifeCare acknowledges the Traditional Owners of country throughout Australia and recognises their continuing connection to land, water and culture. We pay respects to their cultures and to their Elders past, present and emerging.

# Table of Contents

About this Statement ..... 3

Criteria 1 and 2..... 3

Criterion 3 ..... 5

Criterion 4 ..... 6

Criterion 5 ..... 7

Criterion 6 ..... 7

Criterion 7 ..... 7

Board Approval ..... 8

## About this Statement

RSL LifeCare is again proud to report on our progress to date and ongoing activities to understand, identify and address the risks of modern slavery in our operations and supply chains. In the process we are pleased to have collaborated with many of our supply chain partners to share knowledge and raise the level of awareness in addressing modern slavery.

We have found the collaborative efforts in working with both large and small supply chain partners as an effective way to bring about change. Some of our smaller supply chain partners who don't meet the annual revenue thresholds for mandatory reporting continue to show an eagerness to understand modern slavery. We have spent considerable amount of time working with them.

In addition to collaborating with our external supply chain partners, we continue to review and refine our strategies in addressing modern slavery. We held online discussions and workshops with other organisations in the aged care sector to identify optimal collaboration efforts and attended online workshops of various industry forums to maximise our efforts in addressing modern slavery.

While RSL LifeCare has not identified any incidents of modern slavery in our review to date, we understand modern slavery is a complex problem and combating it is an ongoing process. We are committed to collaborate with the industry to address modern slavery. Our modern slavery statement is set out in accordance with the seven mandatory criteria as detailed in the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities.

## Criteria 1 and 2

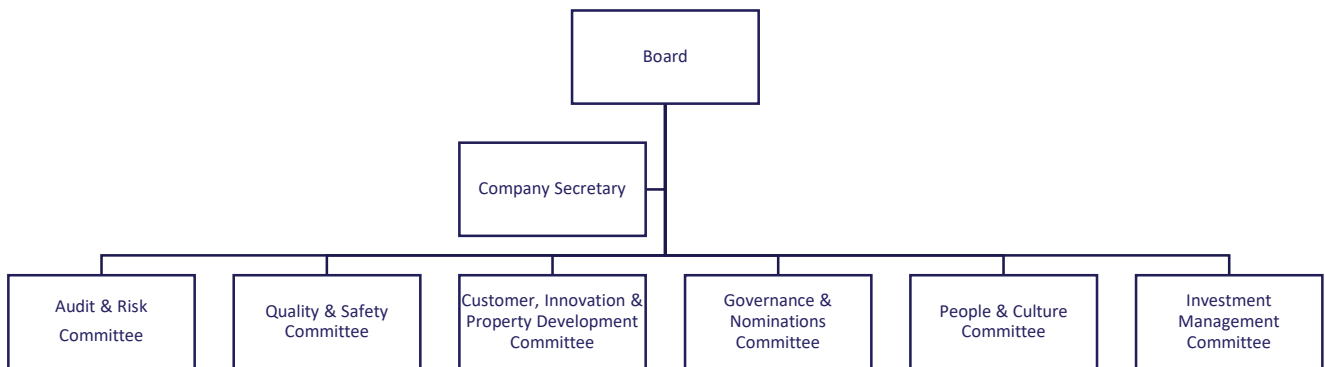
*Identify the reporting entity and describe its structure, operations and supply chains*

### **Organisation Structure**

RSL LifeCare Limited (ABN 43 000 048 957) is the reporting entity, with head office located at 120 Pacific Highway, St Leonards NSW 2065. RSL LifeCare is an Australian public company limited by guarantee and registered with the Australian Charities and Not-for-Profit Commission (ACNC).

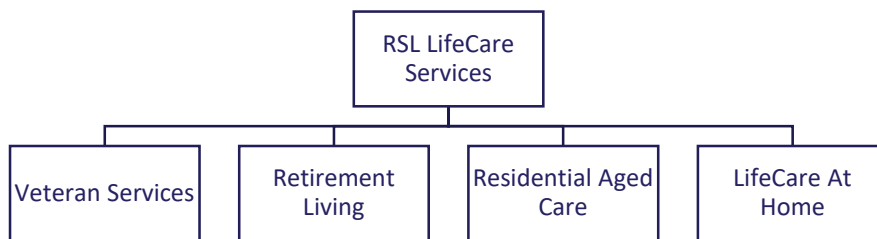
### **Governance Framework**

Our constitution details the governance and objectives of our organisation, with our primary purpose being to provide benevolent relief to persons suffering from ill health, disability, infirmity, homelessness or financial hardship. Priority for these services is to be afforded to veterans and older people. The Board of RSL LifeCare is responsible for the culture, strategy, compliance and performance of the organisation. It ensures that our activities are consistent with our constitution and comply with all legal and regulatory requirements. The Board is supported by six standing committees, set out below –



**Service Operations**

The Board delegates to the Chief Executive Officer the authority to manage the day-to-day affairs of RSL LifeCare subject to the limits specified in the Delegations of Authority. The CEO with a team of experienced senior executives is accountable for service delivery to our clients and residents via four service areas, as set out below –



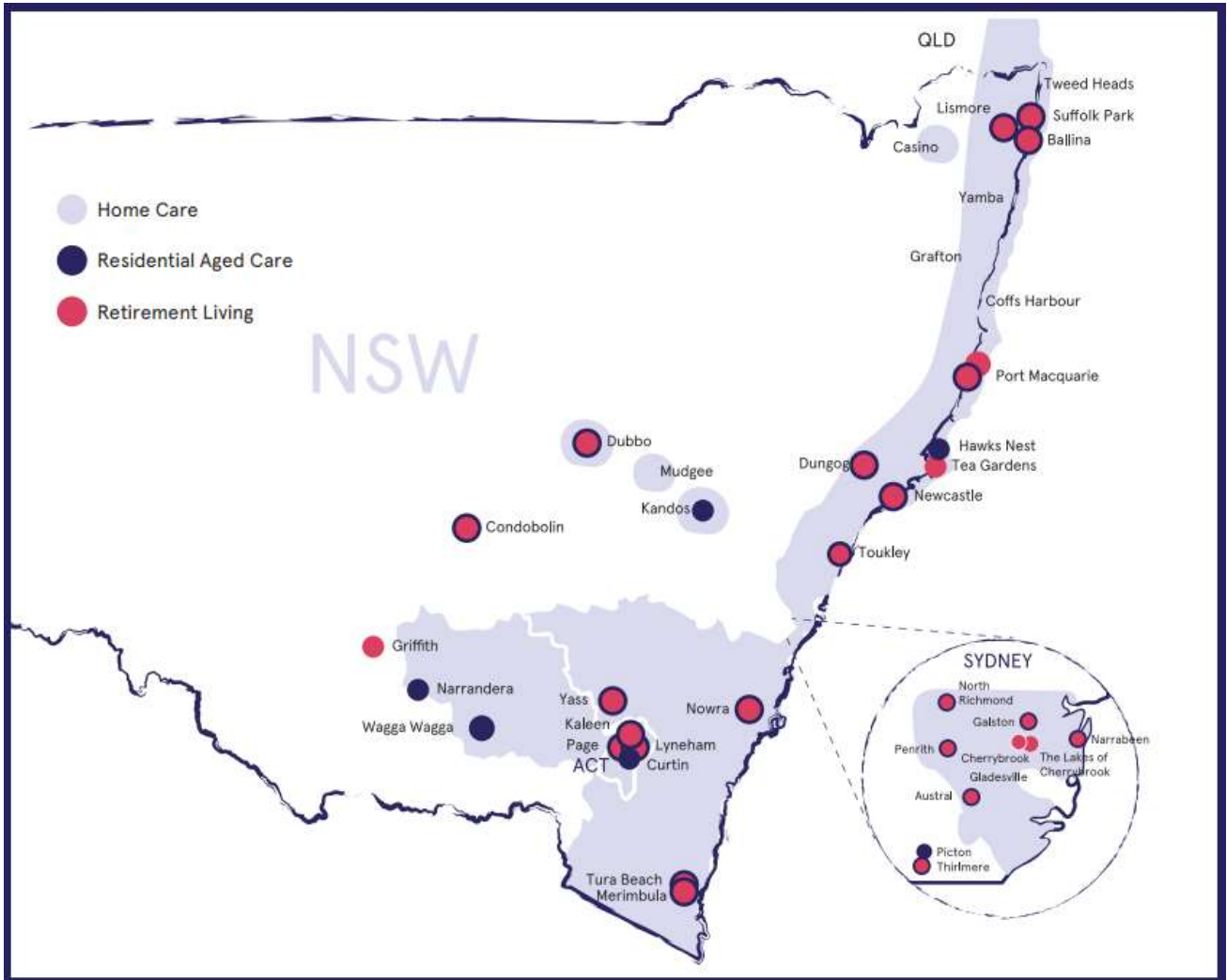
Veterans Services – Provide our veterans with a range of practical support services to help support their finances, mental health and physical wellbeing to live sustainably and independently in their chosen community. A purpose-built Veteran Wellness Centre in Nowra, NSW was recently opened to deliver services to our veterans in these communities.

Retirement Living – Independent living in a vibrant community environment of security and safety, and services include gardening & lawns services, waste services and maintenance, offered in 27 retirement living villages across NSW and the ACT.

Residential Aged Care – Services include nursing care, respite, allied health, meals, laundry and cleaning, offered in 30 homes across NSW and the ACT.

Home Care and Assisted Living Support – Services provided to our clients in their own homes and include transport, cleaning, personal care, garden and home maintenance, home modifications, social support and respite, across NSW, south-east QLD and the ACT.

Locations of our service operations –



**Supply Chains**

RSL LifeCare procures goods and services from many suppliers, with broadly 16 procurement categories, as set out below –

1. Medical Supplies	5. Supplementary labour	9. Workplace Supplies & Uniforms	13. Travel Services
2. Furniture & Equipment	6. Energy & Sustainability	10. Hospitality & Hygiene Supplies	14. Fleet
3. Pharmacy & Allied Health	7. Property Services & Facility Management (FM)	11. IT	15. Construction & Capital Works
4. Food	8. Marketing Communications & Events	12. Consultants & Professional Services	16. Homecare & Community Services

**Criterion 3**

*Describe the risks of modern slavery practices in the operations and supply chains*

## Operations

RSL LifeCare is a service provider in the veteran services, aged care and senior living sector. Our head office is in Sydney NSW. Our employees are predominantly in NSW, with a smaller number in the ACT. We have over 3,500 employees. All employees are remunerated in accordance with Australian employment conditions and standards. RSL LifeCare has strong corporate governance. Our various policies including Recruitment and Whistleblowing, promote a culture that treats everyone equitably, appropriately and consistently. The Australian labour market is fairly regulated. There are tight regulations in the aged care sector. We therefore hold the view that risks of modern slavery in the workforce directly employed by our operations is low. The impact of COVID-19 saw an increasing use of labour from external agencies. Our own staff needed to be relieved and supported due to absence, sickness, leave due to outbreaks. We managed this using preferred and known labour agencies who have undergone a pre-qualification process.

## Supply Chains

Building and construction, facilities management, agency labour and cleaning contract services remain some of the highest potential risks of modern slavery. Our external supplier engagement process includes supplier qualification and risk assessment, supplier terms and conditions or contract clauses, supplier code of conduct, contract management & issue escalation, and supplier engagement & awareness training. Our work to date indicates that modern slavery risks are most likely to present beyond our direct suppliers.

We recognise that COVID-19 has increased modern slavery risks in some supply chains. Demands for Personal Protective Equipment (including masks, gloves and gowns) remain high. We continue to assess and address additional risks within our own aged care supply chains caused by COVID-19.

## Criterion 4

*Describe the actions taken to assess and address these risks*

For this reporting period, RSL LifeCare continued with our ongoing actions and focus, being people, process, policy and suppliers, as set out below –

People	Process	Policy	Suppliers
Train core supply chain staff	Review and embed supplier self-assessment questionnaire in tendering and market testing events	Review modern slavery policy, procurement policy, and supplier code of conduct policy	Engage & collaborate with the wider supplier base
Conduct awareness sessions for wider group	Review and embed supplier code of conduct into contract		Request compliance of supplier code of conduct from high-risk suppliers
Collaborate and share experiences with other aged care operators and industry			Review and assess supply chains of high-risk direct suppliers

We expanded the work previously done in the last reporting period, by conducting a questionnaire via our online platform with 397 direct suppliers, based on a variety of key risk factors such as product/service risk, industry risk, source origin, plus the size of our annual spend.

MSA Questionnaire	High Risk Supplier	Medium Risk Supplier	Low Risk	Total
Supplier Count	22	92	283	397
MSA Compliance	22	92	259	373
	100%	100%	92%	94%

RSL LifeCare spent considerable time with various suppliers in raising the awareness of modern slavery and above is an illustration of our collaborative effort in addressing modern slavery. Although at the time of questionnaire completion, there were still 24 suppliers in the low-risk category (and they are family-owned companies, and our annual purchases <\$70K each), who had not responded to the questionnaire, we are confident no modern slavery risks existed in our direct supply chains.

## Criterion 5

*Describe the effectiveness of actions taken to assess and address modern slavery risks*

RSL LifeCare recognises the significance of reviewing the actions that have been implemented to ensure their effectiveness. In this reporting period, we have reviewed and tracked our actions satisfactorily against our targets. For improvement in effectiveness, in our next reporting period, we plan to engage a third party to benchmark our modern slavery compliance framework, and advise on supply chain analytics and technology, and deeper collaboration with suppliers and industry.

## Criterion 6

*Describe the process of consultation*

RSL LifeCare Limited owns 100% Morshead Home for Veterans and Other Aged Persons Limited and 100% Cherrybrook Lakes Management Services Pty Ltd. Consultation and collaboration with relevant members of the above entities and with other owned or joint entities in the Group, has occurred during various stages of the process.

## Criterion 7

*Other relevant information*

RSL LifeCare is committed to addressing modern slavery in our organisation and supply chains. We are proud of our achievements. We will continue to expand our due diligence processes and work with our direct suppliers in mapping our next tier suppliers, who are most likely to present the potential risks in modern slavery, due partly to geographical locations.

## Board Approval

The Board of RSL LifeCare Limited in their capacity as the principal governing body has reviewed and approved this modern slavery statement.



**Ewen Crouch AM**  
Chairman of the Board



**Janet Muir**  
Chief Executive Officer



.....  
Signature

Date: 8 December 2022



.....  
Signature

Date: 8 December 2022