

MODERN SLAVERY STATEMENT

Plenary Health (NFH) Unit
Trust and Plenary Health (NFH)
Holdings Unit Trust | FY2021



Plenary
Health



INTRODUCTION

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 their freedom. Modern slavery can take many forms including slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, the worst forms of child labour (where children are exploited through slavery like practices or exposed to hazardous work) and forced marriage.

Based on the Global Slavery Index¹, an estimated 40.3 million people are trapped in slavery worldwide, with women and girls disproportionately affected. The pandemic has impacted on State responses to modern slavery and the protection of victims, and has exacerbated vulnerabilities to modern slavery².

Our vision

Plenary Health (NFH) Unit Trust and Plenary Health (NFH) Holdings Unit Trust (together **Plenary Health (NFH)**) are focused on working with the Victorian Government and Western Health to ensure the best health outcomes for the community in Melbourne’s West through the delivery of the new Footscray Hospital. Plenary Health (NFH) is committed to conducting its business with high levels of ethical and professional standards and is committed to recognising and respecting human rights while working on the new Footscray Hospital project.

Plenary Health (NFH) recognises that the nature of its business means that it might be exposed to instances of modern slavery in its supply chains.

We are committed to ongoing engagement with our stakeholders to better collaborate in respecting human rights. We are also committed to undertaking further work to identify and take steps to prevent modern slavery.

Reporting entities

For the purposes of this joint Modern Slavery Statement the reporting entities are Plenary Health (NFH) Unit Trust and Plenary Health (NFH) Holdings Unit Trust.

This Modern Slavery Statement covers Plenary Health (NFH)’s reporting period of 11 March 2021 (date of financial close) to 31 December 2021.

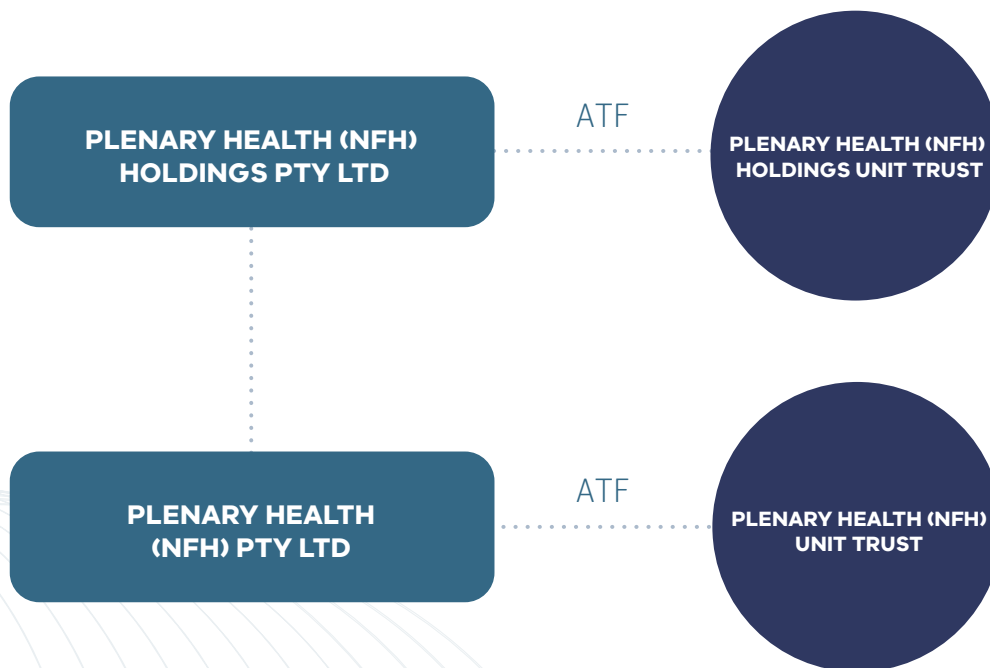
¹ Global Slavery Index 2018. <https://www.globalslaveryindex.org/>

² Modern Slavery & Human Rights, Policy & Evidence Centre, *Good practice in protecting people from modern slavery during the Covid-19 pandemic*, 2.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Structure

Plenary Health (NFH) is a special purpose vehicle (SPV) incorporated for the delivery and maintenance of the new Footscray Hospital during a concession period of 25 years (to 2050). The structure of the SPV is as follows:





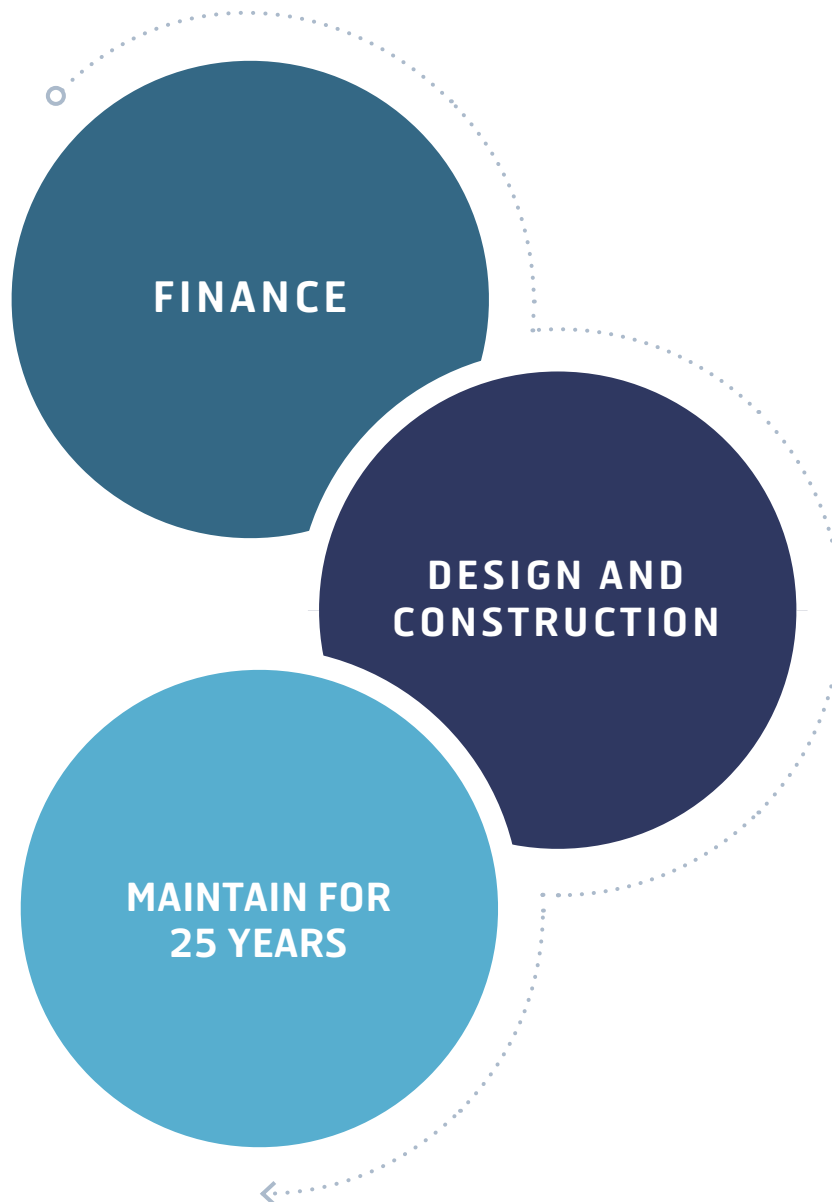
Operations

The Plenary Health (NFH) consortium has been contracted by the Victorian Government, as part of a Public Private Partnership (PPP), to deliver the \$1.5 billion new Footscray Hospital. As part of this Project, Plenary Health will design, construct, finance and maintain the new hospital for 25 years.

The Plenary Health (NFH) consortium is comprised of Plenary as project sponsor and investor, Multiplex as builder,

Honeywell and Compass as the facilities and maintenance managers and Sojitz Corporation as investor.

The management of Plenary Health (NFH) has been contracted to Plenary Asset Management Pty Ltd via a Management Services Deed for the period of the concession.





The new Footscray hospital will provide significant community benefits by cutting wait times and reducing pressure on nearby hospitals.

Plenary Health (NFH) has engaged Plenary Asset Management Pty Ltd to manage the delivery and operations of the new Footscray Hospital. Plenary Asset Management Pty Ltd has engaged a management team of thirteen dedicated people to deliver the management services scope.

Supply Chains

In the 2021 financial year the Plenary Health (NFH) Unit Trust spent approximately \$191 m with 19 suppliers.

The main areas of supplier spend were:

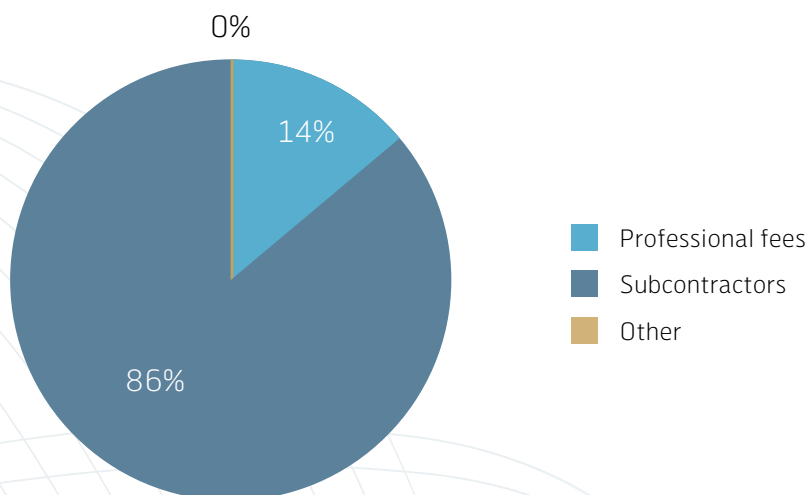
- Subcontractors: for example, costs for the design and construction lead and the services contractor.
- Professional Services: including bid cost recovery for services provided during bid phase of the project, expenses for auditors and tax return services, the Independent Certifier/Reviewer (responsible for certifying construction and design costs completed, and verifying the services that need to be delivered under the Project Deed, issuing Construction Payment Statements or Progress Certificate, etc.), consultants and advisory costs.
- Other: IT services, management services, etc.

The major direct (tier 1) suppliers of Plenary Health (NFH) are:

- Multiplex Constructions Pty Ltd
- Compass Group Healthcare Hospitality Services Pty Ltd
- Honeywell Ltd
- Wilson Parking Australia Ltd
- Plenary Asset Management Pty Ltd

All spend to suppliers is paid to Australian suppliers.

Supplier Spend





RISK OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS AND IN THE OPERATIONS AND SUPPLY CHAINS OF THE ENTITIES WHICH WE OWN OR CONTROL

Guidance on how to identify risks of modern slavery in our operations and supply chains was sought from publicly available resources and external advisers to build an understanding of the potential risk sectors and geographies.

While conducting our initial analysis we referred to resources such as the Global Slavery Index 2018, the Australian Council of Superannuation Investors' Modern Slavery Report Guide for Investors and materials and information on risks of modern slavery produced by the International Labour Organization.

We have considered relevant risks of modern slavery practices by reference to a range of intersecting factors such as business activities, labour force structure, sector and social, political and environmental conditions in the countries in which our suppliers operate.

Operations

In 2021 Plenary Health (NFH)'s operations primarily involved delivery activities, consisting of design management and initial site works.

The D&C contractor is an Australian based entity who has an obligation to comply with all relevant Australian legislation, which ensures a safe working environment for staff working on the new Footscray Hospital.

Plenary Health (NFH) therefore considers the risks of modern slavery across its operations to be low.

Supply chains

In preparing this statement we focused on our suppliers with whom we have a direct contractual relationship (i.e. tier 1 suppliers). However, we acknowledge that incidences of modern slavery can exist throughout supply chains at any level and we are committed to assessing and reporting on these risks further in future years and statements as part of our process for continuous improvement.

Our initial risk assessment consisted of a desktop review of our tier 1 suppliers and review of what peers and competitors have undertaken in this space. In addition to the initial risk assessment we asked all our tier 1 suppliers to complete a modern slavery questionnaire.

ACTIONS TAKEN BY PLENARY AND THE ENTITIES WHICH PLENARY OWNS OR CONTROLS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Actions

In FY2021 Plenary Health (NFH) has taken steps to assess and address the risks of modern slavery practices occurring in our operations and supply chains including:

- The adoption of a specific modern slavery policy which applies to and has been communicated to all directors and officers of Plenary Health (NFH) and which makes clear that we adopt a zero tolerance approach to all forms of modern slavery.
- Clarification in the modern slavery policy on how directors, officers and members of the management team of Plenary Health (NFH) can raise concerns if they become aware or suspect that modern slavery is taking place (through notification to the Company Secretary as soon as possible).
- The mapping of our supply chain, initially at tier 1 level, and assessment of the risk factors present in those supply chains. The compliance, risk, legal and finance teams worked together to conduct a desktop analysis of available information to get an initial view of our supply chains.
- The implementation of our modern slavery questionnaire which asks information about:
 - whether the supplier is required to report under existing modern slavery legislation;
 - whether the supplier has a written policy, procedure or value statement in relation to modern slavery, human rights or ethical trading risks and the impact on their business;
 - whether the organisation is a signatory to, or a member of any modern slavery initiative or charter;
 - whether work is outsourced and if so which proportion of the work;
 - how the supplier conducts due diligence for modern slavery risk;
 - whether there have been any concerns in relation to modern slavery in their business or supply chains;
 - whether the organisation or its agents/subcontractors have been investigated or charged with breaches of legislation relating to modern slavery.
- The completion of the modern slavery questionnaire by all our tier 1 suppliers in relation to calendar year 2021.



Remediation processes

Plenary Health (NFH) is committed to investigating any reports of potential incidences of modern slavery occurring anywhere in our operations or supply chains.

In line with our commitment to conducting our business with high levels of ethical and professional standards we confirm that we would take all appropriate steps to rectify any confirmed incidences of modern slavery in our operations or supply chains. Plenary Health (NFH) would work collaboratively with its suppliers and, if necessary, their suppliers, to achieve these goals. If, for any reason, progress in this regard was not possible, Plenary Health (NFH) would take steps to sever its connections to the offending supplier or sub-supplier.

ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Plenary Health (NFH) will review its modern slavery policy and modern slavery questionnaire on an annual basis to ensure that they remain accurate, up to date and effective.

Plenary Health (NFH) aims to set up processes to discuss and review engagement and feedback between key areas of its business in relation to modern slavery.

Consultation

Plenary Health (NFH)'s structure is set out earlier in this Statement.

The relevant Plenary Health (NFH) entities are integrated and have the same Company Secretary. Their legal, finance and communications functions have all been involved in the preparation of this Modern Slavery Statement and have provided relevant information which is included in this Statement.

Additional information

Plenary Health (NFH) is committed to working to improve its assessment and addressing of modern slavery risks and as such is committed to implementing the following measures in FY 2022:

- communication and engagement with current stakeholders on our modern slavery policy; and
- the roll out of our modern slavery questionnaire to tier 2 suppliers.

After implementation of the above measures Plenary Health (NFH) will be better placed to assess and address:

- further supply chain risks based on the findings from the previously implemented measures;
- potential internal audits;
- the possibility of partnering with industry groups; and
- potential inclusion of modern slavery clauses in new contracts with relevant stakeholders to ensure Plenary Health (NFH) has sufficient leverage to influence stakeholders to change their practices where necessary.



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