

Modern Slavery Statement 2022

This statement, pursuant to Australian Modern Slavery Act 2018 (Cth) No. 153, 2018, sets out the actions undertaken by TriCare to address modern slavery risks in our business and supply chain for the financial year ending 30 June 2022.



The TriCare mission is to empower and support seniors by providing vibrant retirement communities and residential aged care solutions to enable them to live their best lives.

We pride ourselves on building communities and offering services that improve our residents' lifestyles and wellbeing.

As a family owned company for over 50 years our approach has been simple; we treat our residents the same way we would like our own family to be treated – with compassion, genuine care and respect.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Company Details

TriCare Limited ACN 009 657 345

Head Office is at 250 Newnham Rd Mt Gravatt, Brisbane 4122

TriCare employs approximately 1600 employees

Over Financial Year 2021/2022, TriCare:



TriCare owns and operates 15 Aged Care Residencies and 9 Retirement Living Communities in Queensland, NSW and Victoria.

Our supply chain consists of approximately 200 supplier/service provider relationships to source \$25m+ of resident care equipment and consumables, hospitality related products and



maintenance services annually including food, beverages, consumables, labour, cleaning products, safety equipment and professional services.

We are committed to operating in a way that supports the principles of eradicating modern slavery including those contained in the Modern Slavery Act 2018 (Cth)

POLICIES AND GOVERNANCE APPROACH

TriCare recognises the importance of protecting human rights and eliminating slavery. A potential risk is the existence of modern slavery in the supply chain. This risk arises from purchases from local distributors who procure a range of products originating from third-world countries. The main risks categories identified being uniforms and linen supply, medical and cleaning consumables.

It is the responsibility of all TriCare employees, suppliers and contractors to support TriCare's position in respect to modern slavery. TriCare's stance is governed by our procurement policies and procedures including:

- Procurement Policy and Procedures, and
- Supplier Contracts and Pre-qualification

The foundation documents for human rights protection are the Company's Code of Conduct, Equal Employment Opportunity Policy and Procurement Policy and Procedures. These documents outline TriCare's approach to establishing the essential standards of personal and corporate conduct and the behaviour expected of everyone who works for or with TriCare including directors, employees, contractors, and suppliers.

Below these documents sit specific policies and guidelines that ensure the highest standards are achieved across the business. Through contractual arrangements and procurement principles, consultants, agents, contractors and suppliers are required to comply with TriCare policies. The Company's standard terms and conditions require minimum standards in ethical business practices, safety and environment, be met.

Governance

Good corporate governance is critical to the long term, sustainable success of TriCare. It contributes to value creation and positive outcomes for all stakeholders.

Consistent with the Company's risk management approach to human rights, the risk of modern slavery in TriCare's organisation and supply chain is assessed within TriCare's management framework. Given the nature of this risk, the key focus of senior management is working collaboratively with TriCare's suppliers to ensure that expectations and standards are understood and the potential exposure to human rights risks is minimised.

RISK DETECTION

As a provider of Aged Care and Retirement Living services across multiple facilities spread over several Australian states, TriCare is exposed to a number of risk factors through our direct employment of 1600 employees, the engagement of subcontractor companies to deliver services and through our supply chain for consumable goods. Consumable goods may come from third or fourth tier manufacturers in countries known to have historically poor controls around modern slavery.

TriCare engages our suppliers and contractors via supply and service agreements to govern our commercial and legal arrangements. During engagement, suppliers and contractors are required to disclose pertinent information in respect to:

- employees are eligibility to work in Australia
- source country of goods supplied
- control measure in respect to Modern Slavery Legislation

ACTIONS TAKEN TO ASSESS AND ADDRESS THESE RISKS

During the financial year of July 2021 to June 2022, TriCare took a number of initiatives to assess and address risks identified in our operations in respect to modern slavery. These initiatives are overseen by the group Procurement Manager reporting directly to the Board of Directors.

- Review the adequacy of corporate procurement policies and procedures
- Ensured that the modern slavery clause was incorporated into all standard supply contract and supplier pre-qualification/tender documents.
- Risk Assessments of Suppliers to identify at risk organisations.
- Collated evidence from 'at risk suppliers' of their commitment to address modern slavery in their supply chain.
- Ensured that Supplier Agreement Renewal Checklist procedure to incorporate ongoing commitment to address modern slavery in their supply chain when renewing suppliers.

Suppliers are required to comply with the TriCare Policies and standards on ethical business practices, safety, and environment. The due diligence process is initiated by a risk assessment of suppliers prior to awarding the contract. Once the supplier has entered a contract, TriCare monitors the supplier over the term of their agreement for any new risks or issues that may arise in that time.

TriCare has mechanisms for employees and third parties to report suspected illegal activity or breaches of Company Policy, including the Company's Code of Conduct and Whistle-blower Policy. Each disclosure is investigated and reported to the executive.

MEASURING EFFECTIVENESS

In order to ensure that we are addressing the risk of modern slavery within our operations and supply chains effectively, we have developed KPIs and metrics that will be monitored to gauge the effectiveness of our actions. As our understanding evolves, TriCare will update KPIs to ensure our measurements and monitoring are targeted and effective.

Our initial measures include:

- Annual review of processes to identify and address modern slavery risks in our operations;
- Undertaking strategic procurement activities that involve modern slavery factors and engagement, obtaining feedback from tender submissions about this inclusion at completion of tenders;
- Tracking number of high-risk suppliers;
- Engaging regularly and collaborating with stakeholders

CONSULTATION

TriCare's overarching policies, systems and processes are consistently applied across all entities. As a result, this statement has been prepared jointly, in consultation with key team members from the Legal Services, Procurement, Marketing, Finance and Safety Quality and Risk teams. Prior to being put forward to the TriCare Board for review and approval, this Statement was reviewed by TriCare's Executive Team, which is responsible for the day-to-day management of TriCare and leading the delivery of our strategic objectives.

LOOKING FORWARD

Policy review

Review the current policy framework to ensure it meets best practice.

Training

Deliver modern slavery training to all procurement staff to increase capability and ensure they are able to assist suppliers in building their capabilities.



Engagement

Engage with suppliers to ensure they understand their requirements and assist them through the process to build capabilities.

Undertake risk assessments and collate responses from 'at risk Tier 2 suppliers'

STATEMENT APPROVAL AND SIGNATORIES

This statement has been approved by the Board of Directors of TriCare Limited for the financial year ending 30 June 2022.

Signed on behalf of the Directors on this day 9 November 2022.

A handwritten signature in black ink, appearing to read "P. O'Shea", written over a horizontal line.

Peter O'Shea
Director