

RSL LIFECARE LIMITED

ABN 43 000 048 957

MODERN SLAVERY STATEMENT JULY 2022-JUNE 2023



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.

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About this Statement

RSL LifeCare is 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 suppliers for the purpose of raising the level of awareness in addressing Modern Slavery.

RSL LifeCare continues to review and refine strategies around Modern Slavery. The Procurement team assess suppliers' practices regarding Modern Slavery as part of the onboarding process with updated templates and relevant questions about the suppliers' Modern Slavery stances as well as obtaining and reviewing their Modern Slavery Policies.

While RSL LifeCare has not identified any incidents of Modern Slavery within this reporting period, we understand that Modern Slavery is a very complex problem and combating it is an ongoing process.

1. Our structure and business

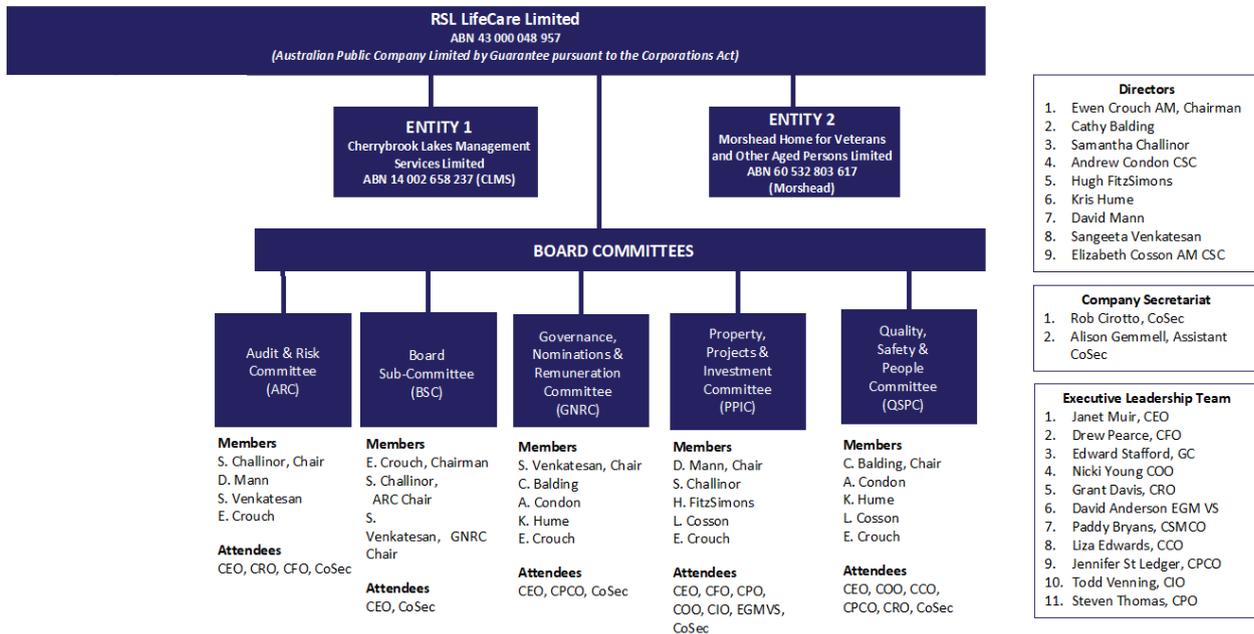
Organisation Structure

RSL LifeCare Limited (ABN 43 000 048 957) is the reporting entity, with head offices 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

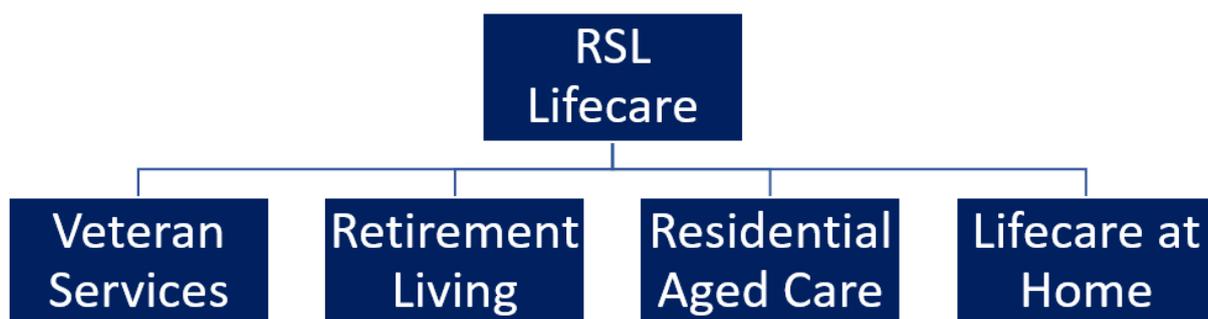
Our constitution details the governance and objectives of our organisation, with our primary purpose being to provide benevolent relief to persons suffering from ill health, disability, infirmity, homelessness, or poverty. Priority for these services is to be afforded to veterans and older people. The 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 standing committees that are demonstrated in the below Governance Structure.

RSL LifeCare Governance Structure



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 –



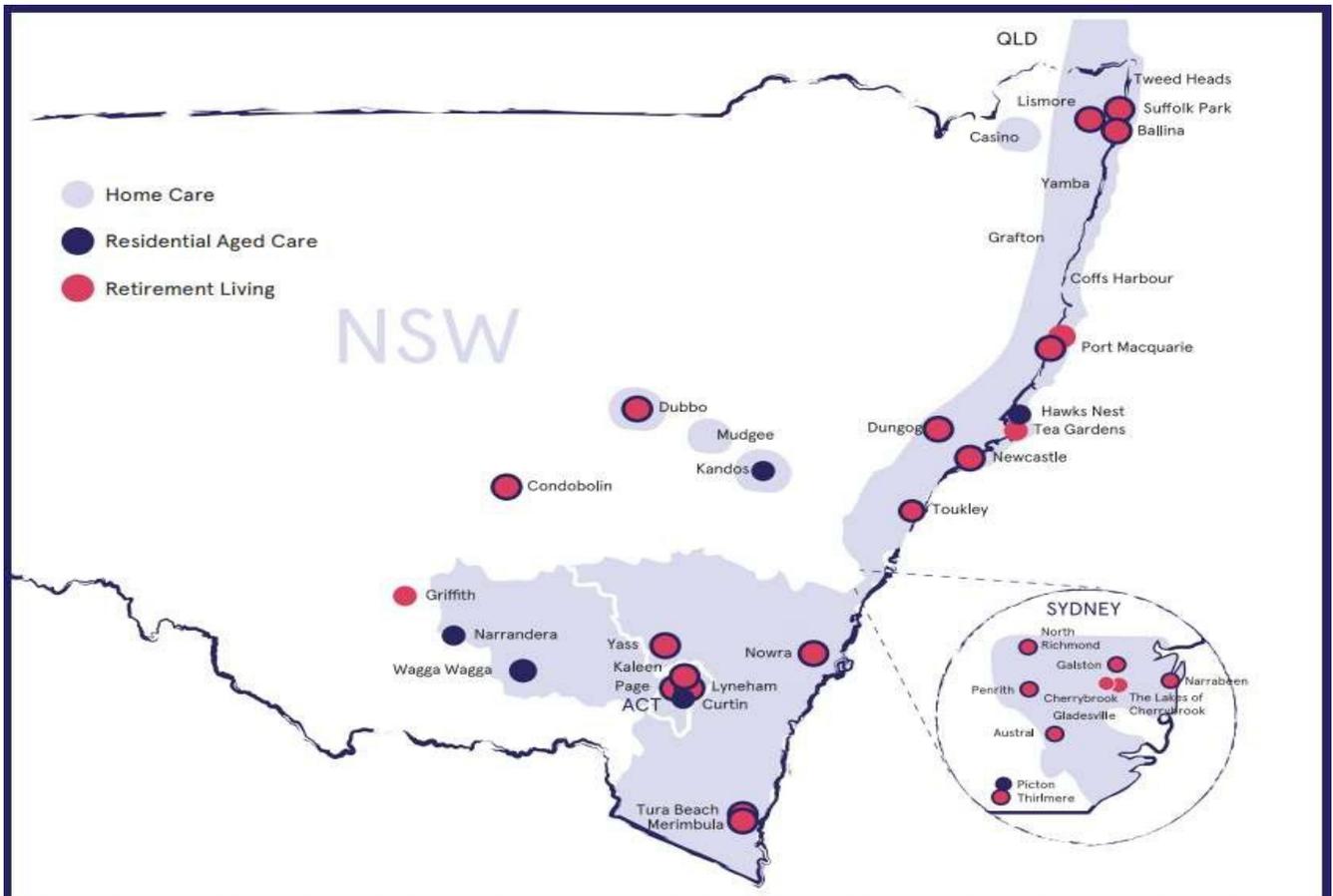
Veteran Services – Provide veterans with a range of practical support services to help support their finances, mental health, and physical wellbeing to live sustainably and independently in their chosen community. Following the successful opening of the Nowra Veteran Wellness Centre, we are planning the opening of another 4 centers in the next 12 months.

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 29 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.

The locations of our service operations are as depicted in the below image.



Supply Chains

RSL LifeCare procures goods and services from many suppliers in the categories outlined below (in no order).

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

2. Identifying risks in the operations and supply chain

Operations

RSL LifeCare is a service provider in the veteran services, aged care, and senior living sector. We operate in a country that is identified as 'low risk' in the Global Slavery Index. Our employees are predominantly in NSW, with a smaller number in the ACT. We have approx. 3,500 employees and we have a further 329 volunteers. All employees are remunerated in accordance with Australian employment conditions and standards, with our employees engaged either under an award, or on a contract.

RSL LifeCare's policies including Recruitment and Whistleblowing, promote a culture that treats everyone equitably, appropriately, and consistently. RSL LifeCare complies with the regulatory environment applicable to the aged care sector. RSL LifeCare hold the view that risks of Modern Slavery in the workforce directly employed by our operations are 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, uniform manufacturing, food, and cleaning services are the categories of highest potential risk. 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 further up the supply chains of our suppliers. Updated RSL LifeCare onboarding and tender documents requests policies and processes that address suppliers deeper supply chain risks.

RSL LifeCare is also undertaking a review of the vendor pool not only for the purpose of consolidating our supplier base but to make it more manageable from a Modern Slavery perspective. This will involve the review and removal of any suppliers who have a poor or immature corporate structure, do not align with the ethical work practices that RSL LifeCare adheres to and any suppliers that have limited Modern Slavery policies and reporting capabilities.

3. Actions taken to assess and address 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 with RSL LifeCare employees	Review and embed supplier code of conduct into contract		Request compliance of supplier code of conduct from high-risk suppliers
			Review and assess supply chains of high-risk direct suppliers

During the next reporting period RSL LifeCare will be conducting some further Modern Slavery surveys with suppliers to ensure that their practices align with the Act and RSL Life’s stance on Modern Slavery.

5. Effectiveness of Actions

Presentations have been conducted with internal teams that discuss the high-risk categories and global statistics around Modern Slavery. This has seen a broader awareness within the business and improvements in RSL LifeCare’s due diligence practices that are conducted to help address and mitigate the risk of Modern Slavery within our business and within the supply chains of our suppliers.

6. Consultation process with owned or jointly owned entities

RSL LifeCare Limited owns 100% of Morshead Home for Veterans and Other Aged Persons Limited and 100% of Cherrybrook Lakes Management Services Pty Ltd. RSL LifeCare has consulted and collaborated with relevant members of the above entities.

Board Approval

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

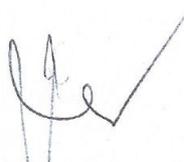


Ewen Crouch AM
Chairman of the Board



Janet Muir
Chief Executive Officer


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7 December 2023


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7 December 2023