

Modern Slavery Statement



About Us

Benetas is a charitable organisation structured as a public company limited by guarantee, and does not own or control any other entity.

Benetas is a leading not-for-profit organisation engaging approximately 1800 employees, with a mission to provide older Victorians, their families and carers with a full range of quality community based services, residential aged care homes, retirement living, primary and home care plus respite services, across metropolitan and regional Victoria. Benetas' main operations include its aged care and community health care services, including the people it directly employs.

Benetas' supply chain includes suppliers and contractors covering hospitality services (i.e. food services, catering, cleaning, laundry); allied health; agency labour; pharmacy & medical supplies; property services (i.e. maintenance, utilities, waste management, security, etc.); information, communication & technology; gardening; equipment purchases; capital & property development works, and investment advisers.

Modern Slavery Position

Benetas rejects any form of modern slavery and human trafficking, and we are committed to implementing effective systems and controls to ensure it does not take place directly within our own business or our supply chains. We respect the human rights of our employees, volunteers, customers, suppliers and business partners, and we aim to identify and manage any risks related to these rights.

Our Workplace Risk Assessment

Benetas engages employees that align with our values and we comply with all relevant local and national laws related to human rights and modern slavery in our workplace. As an organisation a strong focus is placed on managing the health, safety and wellbeing of our employees and volunteers. We are committed to maintaining a diverse and inclusive workplace, treating people with respect and

dignity, and have no tolerance for discrimination or harassment.

As an aged care service provider in a highly regulated industry, Benetas considers the risk of modern slavery within its direct business operations to be relatively low. However Benetas recognises that through its supply chain, Benetas may be indirectly exposed to the risk of modern slavery and human trafficking.

Our Investment Funds Management Policy

Benetas' investment strategy covers environmental, social and ethical considerations when selecting suitable investment opportunities and explicitly states that companies who knowingly engage in, or are suspected of engaging in modern slavery through supply chain activities will not be considered.

Our Actions Taken

Benetas undertakes awareness training for employees to mitigate any potential human rights violations in our business operations and supply chains through:

- **Governance** – Benetas raises the awareness of modern slavery risks, informing the board and management of our obligations and accountabilities for identifying and managing these risks.
- **Awareness Training** – An updated human rights / modern slavery awareness training module has been introduced for completion by relevant managers involved in the procurement of goods and services within Benetas. Completion rates are monitored as part of our key performance indicators.
- **Supplier Obligations** – Benetas has a Supplier Code of Conduct which outlines Benetas' commitment to ethical, socially responsible and sustainable practices and makes it clear that we are committed to developing relationships with business partners, suppliers and contractors that align with our values and commitment to managing

Modern Slavery Statement continued

modern slavery risks. The Supplier Code of Conduct is issued to all new suppliers upon application to become a Benetas supplier.

- **Supplier Selection** – Tender documents request tenderers provide information on their approach to managing modern slavery in their supply chain. Supplier responses influence the evaluation and final supplier selection. Updated standard supplier templates, and contractor management approach raises expectations of our commitment to managing modern slavery risks within our supply chains. Where suppliers are deemed to be high risk, a modern slavery survey has been developed for inclusion in regular contract management discussions.
- **Supplier Compliance** – Benetas uses an online contractor compliance and induction application adopting a risk based approach. Using this risk based framework Benetas will target high risk categories and suppliers utilising a contract management approach.
- **Grievance and Feedback Mechanisms**
 - Benetas has a Whistleblower Policy and complaints mechanism process that allows all Benetas directors, executives, managers, employees, volunteers, suppliers, contractors and consultants, with the ability to raise concerns such as modern slavery risks in a confidential manner.

What we are planning

Benetas intends to strengthen our understanding of human rights issues as they apply to our business operations and in particular our supply chains.

Our key areas of focus will be to:

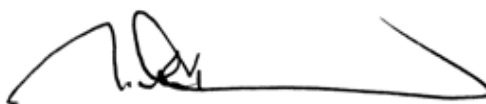
- Continue to update relevant Benetas policies and procedures to specifically reference modern slavery risks and key accountabilities.
- Procurement Risk Assessment – Benetas has configured a risk-based assessment framework into our compliance and induction application for procurement. This framework effectively identifies supplier segments that may carry a higher risk of human rights violations within their supply chain. Within the application, suppliers are required to

respond to risk-based inquiries and acknowledge their agreement to the Supplier Code of Conduct. This valuable tool serves as a means for relevant managers to educate themselves and mitigate risks associated with engaging in supply arrangements that may potentially expose Benetas to modern slavery practices.

- Work directly with suppliers identified as high risk categories for modern slavery, including linen and uniform suppliers, medical consumables, and catering services. The focus will be to investigate in more depth how high risk suppliers understand where their greatest exposure to modern slavery is within their own supply chains and what they plan to do towards identifying or reducing this exposure.
- Develop and use standard template supplier agreements (where applicable) to raise expectations of our commitment to managing modern slavery risks.
- Continue to develop key performance indicators in our contracts to measure the effectiveness in preventing modern slavery risks.

Statement

This statement was approved by the Board of the Anglican Aged Care Services Group trading as Benetas (ABN 60 082 451 992) pursuant to section 13 of the Modern Slavery Act 2018 and constitutes our modern slavery and human trafficking statement for the financial year ended 30 June 2024.



This statement is signed by Michael Urwin in his role as Chairman of Anglican Aged Care Services Group.

Michael Urwin

Chairman

September 2024