

# Healthcare Australia's Modern Slavery Statement FY2022



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# Modern Slavery Statement FY2022

## Introduction

Healthcare Australia (ACN 108 180 589) Modern Slavery Statement (the **Statement**) is made pursuant to the requirements of the *Modern Slavery Act 2018* (Cth) (the **Act**). This Statement sets out the actions and strategies to identify, assess, and address modern slavery risks across operations and supply chains for the 2022 financial year reporting period.

We consider the definition of modern slavery in line with the Act which may include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

Apollo Holdco Pty Ltd, Healthcare Australia Pty Ltd, and all subsidiaries (together referred to as **HCA**) is a reporting entity for the purposes of the Act as it is a company that conducts business in Australia with a consolidated revenue of over A\$100 million during the reporting period.

Healthcare Australia is committed to ethical operations, including limiting the risk of modern slavery occurring within its own business, and related supply chains other business relationships.

## Overview

HCA is one of Australia's largest healthcare providers and predominately provides clinical and support services in the healthcare industry, including the provision of services supporting community and corporate health.

HCA's principal business activities are:

- Recruitment – HCA places healthcare professionals into private and public hospitals on a short or long term or permanent basis. We also place health care professionals into home and residential facilities.
- NDIS and Disability – HCA is a registered NDIS provider and provides customised NDIS support for eligible participants such as nursing and complex care, supported independent living and community services
- Allied Health – HCA provides specialist allied health services in residential aged care, community care and NDIS.
- Aged Care – HCA provides aged care services including home help, nursing & specialist care, family & respite, and out & about care.
- Corporate Health Services – HCA provides corporate health programs to workplaces including vaccinations, general health checks and ergonomic assessments.
- Training and Courses – HCA delivers mandatory training, accredited qualifications and continuing professional development online and face-to-face for individuals and organisations.
- Large Health Projects and Programs – HCA develops and delivers large bespoke comprehensive health programs for governments and health organisations.

## Supply Chain

### **Supply chain and modern slavery risks**

HCA predominantly supplies health workforces to the Australian Health sector and procures a range of goods and consumables to support the delivery of these services. HCA has assessed these as having a relatively low modern slavery risk exposure through its direct suppliers due to most being Australian organisations, that are required to comply to the *Modern Slavery Act*. HCA is working on the identification of its suppliers' supply chains.

### **Supply chain - workforce**

HCA predominately provides human resources, with staff costs accounting for 95.8% of total expenditure.

All core business activities are undertaken in Australia and New Zealand, which are considered as a low risk for modern slavery occurrences. In addition, several measures are in place which further reduce this risk.

These measures include:

- Vetting – All HCA staff are recruited through HCA's stringent recruitment programs and are vetted through HCA Australia's compliance and competency standards, including all international staff.
- Visa controls – International visa holders are vetted and approved for work in Australia by the Department of Home Affairs to ensure compliance with their visa terms and conditions. HCA ensures that no employees are indentured or restricted and the only restrictions that may exist imposed by the Department of Home Affairs onto visa workers.
- Contracts – All staff are employed under contracts, which are based on awards or industry requirements under the *Fair Work Act 2009*.
- Policies – Working standards and conduct are supported by HCA's the Code of Conduct, and HCAs' Whistleblower Policy which supports anonymous and protected reporting of any breaches

### **Supply chain – other goods and services**

Goods make up a minority of HCA's total expenditure (2.2%). This is comprised of operating expenses (2.1%), and Consumables (0.1%). The majority being 97.9% of total expenditure is on operating expenses that include Staff, Marketing & Communications, and Facilities.

HCA sources the majority of goods and services from Australian providers and suppliers, with only minimal expenditure being attributed to international marketing spend. This spend is with large reputable multinational corporations.

## Governance

HCA has continued its focus on delivering the highest ethical, safety, clinical and professional standards, and to fully embrace its responsibility as a healthcare provider to address modern slavery risks. HCA maintains an assessment of minimal modern slavery risk within its current operational and service requirements.

### **Corporate Governance**

HCA continues to review and audit policies and procedures to ensure that there are sound governance processes in place to meet modern slavery compliance requirements. HCA conducts reviews of policies, such as our Code of Conduct and Whistleblower, to ensure inclusion of modern slavery clauses to increase employee awareness of the risks of modern slavery in the business and supply chain.

## ***Policy Framework***

HCA has a framework for responsible and sustainable governance that is managed through the businesses certified Quality System under ISO 9001:2015. HCA's policy framework ensures that the business operates in an ethical and responsible manner and supports endeavors to identify exposures in business operations and supply chains.

Key documents related to the identification and management of modern slavery risks include:

- Code of Conduct
- Whistleblower Policy
- Supply Chain Integrity Policy
- Risk Management Strategy

## ***Summary of actions undertaken***

HCA continues to reduce modern slavery risks in the supply chain. Over the past two financial years, HCA is making progress, coordinating different actions across the organization to address modern slavery risk.

This includes:

- Identification of key requirements for Modern Slavery improvement plan
- Development of HCA Supplier Questionnaire, under review for implementation
- Development of Supplier's code of conduct, under review for implementation
- Development of Modern Slavery learning module, under review for implementation.

## ***Future actions***

HCA will continue to implement measures to enhance the management and mitigations of modern slavery risks.

In the future, it is anticipated that these activities will include:

- Reviewing supplier contracts and integrating enhanced controls
- Establishing Modern Slavery reporting procedure
- Undertaking supply chain mapping
- Including supplier screening in the Internal Audit program
- Conducting Modern Slavery risk assessments based on mapping and audit information

## **Continuous Improvement Plan**

HCA has a process of continuous improvement as part of its quality systems program. Any finding identified during the internal audits, it will be reviewed and assessed for continuous improvement.

Modern Slavery breaches identified will be managed according to HCA's Incident Management Standard.

## Consultation

This statement is made pursuant to the Act and constitutes HCA's Modern Slavery statement in respect of the 31 December 2022 financial year. It is approved by the principal governing body of Healthcare Australia, being its Board of Directors.

The related HCA entities all have the same Board of Directors, and therefore Directors of all related entities have been consulted with in preparing this Modern Slavery Statement.

Signed,



John Pappalardo  
Chief Executive Officer, Healthcare Australia Pty Ltd

Dated: 30/06/2023