



Modern Slavery Statement

Statement for 2022



Disclosure note

This is a joint modern slavery statement made by St John of God Health Care Inc (ARBN 051 960 911) on behalf of itself and the entities it controls or owns including:

- St John of God Hawkesbury District Health Campus Ltd (ACN 608 054 379);
- St John of God Outreach Services (ACN 064 831 965);
- St John of God Foundation Inc (ARBN 066 805 132);
- St John of God Midland Health Campus Ltd (ACN 152 874 845);
- Dencross Pty Ltd (ACN 086 647 298);
- St John of God Berwick Health Campus Ltd (ACN 606 404 915); and
- Marillac (ACN 050 463 717) (together, for the purposes of this statement “St John of God Health Care”)

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Roadmap

2023

Operationalisation - continue effectiveness review and monitoring

Improve and enhance campaign to improve communication and awareness

Refine our supplier engagement and communication approach

Continue to rollout modern slavery training to broader group of caregivers at St John of God Health Care

Continue to add modern slavery clauses in new agreements (Top Tier Supplier, across key categories)

Set the Modern Slavery 101 training as compulsory for key procurement and supply chain, facilities management and selected team via the learning management platform

Review and updated business maturity assessment

Review approach/ framework

Review change impact assessment

Continue to add Top Suppliers to the SEDEX platform

Review Policies and Procedures

Improve supplier engagement across the high impact categories

Collaborate and leverage the knowledge gain from engaging with ACAN, CNA and our Healthcare Forum peers to improve visibility of supply chain risks

2021

Extend and involve

Updated agreement and RFx templates to include modern slavery clauses

Added modern slavery clauses in new agreements (Top Tier Supplier, ICT and PPE Categories)

Reviewed ACAN Modern Slavery 101 training program and added all available modules to St John of God Health Care learning and development platform

Reviewed and updated business maturity assessment

Review approach/ framework

Reviewed change impact assessment

Add top 25 suppliers to the SEDEX platform

Reviewed policies and procedures

Extended risk assessment beyond tier 1 suppliers

Reviewed goals, targets and KPIs

Partner with ACRATH to communicate the impact of modern slavery

2022

Effectiveness review and monitoring

Improved agreement and RFx templates to include modern slavery clauses

Added modern slavery clauses in new agreements (Top Tier Supplier, ICT and PPE Categories)

Reviewed all ACAN Modern Slavery training program modules and added all available modules to SJGHC Learning and Development platform

Reviewed and updated business maturity assessment

Review approach/ framework

Reviewed change impact assessment

Invited top 50 suppliers to the SEDEX platform

Reviewed policies and procedures

Extended taxonomy risk assessment to all suppliers active suppliers

Reviewed goals, targets and KPIs

Partner with ACRATH, CAN, ACAN, Catholic Health and Catholic Mission to communicate the impact and collaborate of modern slavery risks in our supply chains

2020

Approach

Conduct risk assessment and gap analysis

Reviewed ACAN Modern Slavery 101 training program and approved for use with minor adaptations for St John of God Health Care

Deployed training to steering committee

Develop policies and processes

Engage with high priority Tier 1 suppliers

Establish working group

Launch awareness and communication campaign

2019

Initial awareness and mobilisation

Engage with Catholic peer and industry groups

Undertake due diligence activities

About us



ST JOHN OF GOD
Health Care

St John of God Health Care is a leading provider of high-quality health and community services across Australia, and New Zealand.

We were established more than 30 years ago by the Sisters of St John of God, who first arrived in Western Australia and commenced caring for the community in 1895.

We are one of Australia's largest Catholic health care providers, employing more than 16,000 people.

As a not for profit group, we return all surpluses to the communities we serve by updating and expanding our facilities and technology, developing new services, investing in people and providing our social outreach services to those experiencing disadvantage.

Vision, Mission and Values

Vision

We are recognised for care that provides healing, hope and a greater sense of dignity, especially to those most in need.

Mission

To continue the healing Mission of Jesus

Values

Our values reflect our heritage and guide our behaviours:

Hospitality

A welcoming openness, providing material and spiritual comfort.

Compassion

Feeling with others and striving to understand their lives, experiences, discomfort and suffering, with a willingness to reach out in solidarity.

Respect

Treasuring the unique dignity of every person and recognising the sacredness of all creation.

Justice

A balanced and fair relationship with self, neighbour, all of creation and with God

Excellence

Striving for excellence in the care and services we provide.



Our initiatives in 2022

Partnership with other Catholic health care providers

We continued our partnership with the Australian Catholic Anti-Slavery Network (ACAN) for a further year to leverage their strength and expertise across Australia's largest network of Catholic hospitals and aged care service providers.

We have also partnered with Australian Catholic Religious Against Trafficking in Humans (ACRATH) for a series of Formation events to improve awareness of modern slavery. We partnered with ACAN and University of Notre Dame, and Catholic Mission on key speaker events providing feedback on our modern slavery program and key lessons learnt during the process.

We continued as a member of the Catholic Network Alliance (CNA) Joint Procurement Network (JPN) to engage with suppliers collaboratively.

Ansell engagement

On August 24, 2022, ABC published an article alleging that Ansell was knowingly profiting from slave labour at a Malaysian supplier. As a member of the Australian Catholic Anti-Slavery Network (ACAN), St John of God Health Care became alarmed and decided to engage with Ansell in a unified approach through ACAN. ACAN met with Ansell representatives twice in 2022, on September 7 and December 8. At this point the allegations have not been substantiated however independent investigations continue regarding the matter. In the event of adverse findings, St John of God Health Care will progress based on our zero tolerance position on Modern Slavery.

Supplier surveys

As part of ACAN and CNA, we continued our engagement with our top 50 suppliers to understand their procurement and sourcing practices. We use the information for risk assessment and vendor management. Thirty three providers provided comprehensive feedback through the engagement process with 19 providers joining the SEDEX platform. Three providers elected not to join the SEDEX platform.

Contract management

We progressed with executing variations to contracts, including the new anti-slavery clauses for 55 of our suppliers. We continue to include the new anti-slavery provisions in new contracts through sourcing events and contract variations on existing contracts.

We reviewed our templates to ensure that the modern slavery provisions are up to date. We continued to monitor the personal protective equipment (PPE) and the information communication and technology (ICT) category suppliers to ensure that we manage the supply chain risk in more detail.

In addition, we are varying the contract terms to include clauses addressing modern slavery risks across our top tier ICT category with an annual spend of \$32million and personal protective equipment (PPE) with a annual spend of \$12million.



Risk assessment and framework

As in 2022, independently of ACAN, we reviewed our supply chain risks to use as basis for discussion with our vendors and have put in place actions across the management cycle.

We expanded the work done identifying and conducting a taxonomy risk assessment of our top 565 suppliers to 4,266 suppliers. We continue to invite our leading tier suppliers to join the SEDEX platform to work together to understand modern slavery risk in the supply chain. Nineteen of our top suppliers have joined the platform to date.

Ethical sourcing guidelines

The ethical sourcing guidelines and *Socially Responsible and Ethical Business Practice Statement* have been reviewed and updated. The latest statement is included with every new blanket purchase agreement that is provided to our service providers who operate under such agreements.

Supplier Code of Conduct

We have completed the *Suppliers Code of Conduct*, which provides guidelines on the practices, behaviour and other requirements we expect of our suppliers, including compliance with ethical sourcing.

Modern Slavery Policy annual review

The *Modern Slavery Policy* annual review was completed in February 2023. The review did not identify any requirements for changes.

Education and training

We are planning to extend the training to a broader group of key members in the procurement and supply chain, facilities management and other identified areas in St John of God Health Care during the next period. Modern slavery training is now available in our learning and development platform and compulsory training measures will be set for the aforementioned groups.

All members of the working group undertook *Modern Slavery 101*,

Business Readiness and Grievance Mechanisms and Remedy training, developed by ACAN, to build organisational understanding and knowledge. We have also included the five training modules *Modern Slavery 101*, *Business Relevance*, *Implementing a Modern Slavery Risk Management Program*, *Grievance Mechanism and Remedy*, and *Modern Slavery Risk Management for Suppliers* training in our learning and development platform.

Governance and reporting

We have continued standardised, regular reporting to the St John of God Health Care Board, and Audit and Risk Committee (ARC) to ensure scrutiny and oversight.

Change impact assessment

We completed a re-assessment of changes needed across St John of God Health Care. As a result, we identified additional areas impacted by modern slavery practices and have taken steps to implement internal changes to identify and address modern slavery.

Communication

We continue to improve awareness as part of our Formation framework to help employees better understand modern slavery, the risks and flags they may encounter, and our organisational position, including St John of God Health Care's actions to reduce the risk of modern slavery within the procurement and supply chain environment.

We continue to leverage the *International Day for the Abolition of Slavery* to promote understanding and awareness of modern slavery internally through a range of mass communication via electronic channels.

Action plan

We have refined and extended our action plan, which outlines initiatives across due diligence, monitoring and reporting, training and awareness-raising, risk management and compliance, and communication, which forms part of a broader five-year roadmap.

Our plans for 2022 and beyond

Partnership with other Catholic health care providers

We joined a number of workgroups in partnership with the Australian Catholic Anti-Slavery Network (ACAN) and Catholic Network Alliance (CNA) Joint Procurement Network (JPN) to engage with suppliers collaboratively to address supply chain risks.

ACAN Health Working Group

– collaborative approach with our peer healthcare providers to engage our suppliers on modern slavery risk in the supply chain.

CNA – Leadership Forum

– discuss and collaborate with our Catholic peer group on procurement and supply chain initiatives.

CNA – ICT Working Group

– discuss and collaborate on ICT specific procurement and supply chain initiatives

Risk assessment

Following the extension of our taxonomy risk assessment to include 4,266 suppliers, we will review and update the analysis as we improve our understanding of the supply chain risk in the environment.

We continue to engage our top 75 suppliers with a more detailed review of the risks in their supply chain and will extend this to the top 100.

Education and training

We continue to review our training requirements and plan to develop job-specific training in the high



We will continue to work with our top 75 suppliers to ensure that the contracts are reviewed and amended to include the relevant modern slavery clauses.

risk areas for facilities managers, supervisors and coordinators.

We continue to roll out *Modern Slavery 101*, *Business Relevance*, *Implementing a Modern Slavery Risk Management Program*, *Grievance Mechanism and Remedy*, and *Modern Slavery Risk management for Suppliers* training through our learning and development platform for inclusion in mandatory training for key caregivers in the procurement and supply chain division during 2023.

Contract management

We will continue to complete and execute variations to contracts, to include the modern slavery provisions for our top 55 suppliers, and across the leading tier suppliers in the ICT and PPE categories.

We will continue to work with our top 75 suppliers to ensure that the contracts are reviewed and amended to include the relevant modern slavery clauses.

Supplier compliance framework

We continue to review modern slavery commitments in our supplier onboarding online application, and expect all new suppliers to be aware of the St John of God Health Care focus on modern slavery during the onboarding process.

We will continue to develop and implement supplier compliance frameworks, such as screening, ongoing evaluation, and auditing to improve supplier practices through collaboration, relationship management and training for suppliers.

Change management

We will continue to confirm changes to policy and procedures with all facilities managers and undertake other change management activities to embed anti-modern slavery practices and initiatives within our organisation.

Governance and reporting

In accordance with our commitment to combat modern slavery, we will continue implement and update our governance and reporting mechanisms to monitor the effectiveness of our efforts.

We will continue to monitor our key performance indicators (KPIs) to measure our progress and report to the St John of God Health Care executive team and Board for their oversight.

Furthermore, we recognise the importance of transparency in our reporting and will strive to continually improve it. Our current reporting framework provides information on spend, risk, and contracts by supplier and category. We will work towards enhancing this framework to ensure that it remains relevant and effective in identifying and addressing modern slavery risks.

In line with our zero-tolerance stance on modern slavery, we will actively monitor our grievance and whistleblowing platforms to address any concerns raised by internal or external parties. By doing so, we aim to provide a safe and confidential platform for individuals to voice their concerns and help us maintain the highest standards of ethical conduct across our operations.





Statement

from St John of God Health Care Board Chair

St John of God Health Care was established more than 30 years ago by the Sisters of St John of God, who had been providing health care and community services since the late 19th Century in Australia and beyond. As a Catholic Ministry, we believe in the intrinsic and unique dignity of every person.

We have zero tolerance for modern slavery and the exploitation of people in any form.

We recognise that modern slavery can be difficult to detect, particularly within supply chains. To mitigate this risk, we apply principles of good corporate governance and foster an ethical and responsible organisational culture.

To combat modern slavery, we work closely with our suppliers and contractors to meet human rights obligations and promote fair, transparent practices. St John of God Health Care has completed risk assessments across a broad range of suppliers and negotiated anti-modern slavery terms in existing and new supply contracts.

Collaboration with other organisations, including the Australian Catholic Anti-Slavery Network (ACAN), Catholic Health Australia (CHA), and Catholic Network Alliance (CNA), has also helped improve our practices in identifying and mitigating modern slavery risks.

During the past year, St John of God Health Care has made progress across nine key measurement criteria to combat modern slavery, maintaining business maturity status across a further 13.

We acknowledge that eradicating modern slavery requires a collective effort, and we remain deeply committed to collaborating with government and other organisations to address this issue.

We will continue to make progress in our efforts to combat modern slavery and uphold the dignity and rights of all individuals.

We are proud to present our third modern slavery statement, which has been reviewed and approved by the St John of God Health Care Board.

We reaffirm our commitment to eradicating modern slavery in all its forms.

Hon Kerry Sanderson AC CVO

This Modern Slavery Statement was approved by the principal governing body of St John of God Health Care Inc as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 29 June 2023. This Modern Slavery Statement is signed by a responsible member of St John of God Health Care Inc as defined by the Act.

Reporting Criteria 1 & 2

About St John of God Health Care

Governance and organisational structure

St John of God Health Care Inc. is an incorporated association, the members of which are the directors of St John of God Australia Ltd, a civil and canon law entity established in 2004

to sponsor the ministry that was previously sponsored by the Sisters of St John of God. The Sisters are members of St John of God Australia Ltd and

share sponsorship of the ministry with eight of the dioceses in which the group operates as well as the Hospitaller Order of St John of God.



St John of God Health Care Our organisational structure



Our governance framework

Our governance structure is two-tiered, comprising Trustees and a Board.

The Trustees have canonical responsibility for St John of God Health Care. They appoint and evaluate the performance of Board members.

The Board is accountable for the organisation's ongoing stewardship and strategic development. The Board is assisted by the Board committees in discharging its responsibilities.

St John of God Health Care applies principles of good corporate governance and good practice, based on recommendations by the Corporate Governance Council of the Australian Stock Exchange and others.

The roles and responsibilities of the Trustees, Board and management are set out in the St John of God Health Care Inc. constitution and delegated responsibility to management is outlined in a *Governance Authority Matrix* and a *Management Authority Matrix*.

The Audit and Risk Committee (ARC) has accountability for oversight of the management of modern slavery risks.

Our People

Our People

St John of God Health Care employs more than 16,000 people across Australia and the Asia-Pacific region.

We are an inclusive organisation and recognise the contribution of all our people for their skill, expertise, experience and innovative thinking.

A snapshot of our workforce reveals that 56% are professional nurses and midwives, 81% are female and 59% work part-time, with a further 28% being casual employees. This mix is consistent with our desire to provide a range of flexible employment options to attract the best people to our organisation.

The employment of people with disability is a growing feature of the organisation's recruitment and selection process and a critical component of our *Disability Action and Inclusion Plan*.

We also continue to create more opportunities to welcome Aboriginal and Torres Strait Islander people as caregivers at St John of God Health Care, through our revised *Reconciliation Action Plan 2020 -2022*.

We demonstrate leadership in safety in the workplace through a multi-faceted occupational health and safety strategy that includes prevention, early reporting and intervention and investigation into causal factors.

A connected and coordinated learning and development function enables our people to respond to emerging industry trends, community needs and organisational management.

Our operations

St John of God Health Care is a provider of high quality health care and community services.

Hospital operations and nursing

We are an experienced hospital operator with 14 private hospitals in Western Australia, Victoria and New South Wales. Most of our hospitals are acute and we are particularly well-known for our maternity, oncology and orthopaedic services.

In addition to our general acute hospitals, we have three specialist mental health hospitals, St John of God Richmond and Burwood Hospitals in New South Wales and St John of God Pinelodge Clinic in Victoria, and a specialist rehabilitation hospital, St John of God Frankston Rehabilitation Hospital in south east Melbourne.

We operate two public hospitals under public private partnerships (PPPs), St John of God Midland Public Hospital in Western Australia and Hawkesbury District Health Service in New South Wales. In total, we have 3,374 hospital beds.

In 2021-22 we treated more than 360,000 overnight and same day patients. We deliver more than 10,000 babies every year and are the biggest provider of private maternity services in our home state of Western Australia.

We operate a range of public and community health care contracts in all three states.

St John of God Social Outreach services

As a not-for-profit organisation, St John of God Health Care has a proud history of providing outreach services in areas of unmet need. These are delivered by St John of God Social Outreach for free or at low cost through an allocation of eligible revenue from hospitals across 52 locations in Australia.

Outreach services build capacity and support the physical, mental and emotional wellness of vulnerable and disadvantaged communities. Social Outreach supported 6421 people, provided 43,074 nights of stable accommodation in 2021- 2022

The services build capacity and support the physical, mental and emotional wellness of people in vulnerable and disadvantaged communities in WA, Victoria, NSW and the Asia Pacific.

Services include:

- Community mental health counselling and support provided by St John of God Mental Wellbeing Services and Midland Head to Health
- Specialist mental health support for new parents via St John of God Raphael Services
- Support for people with drug and alcohol dependence, provided by the South West Community Alcohol and Drug Service and the Drug and Alcohol Withdrawal Network
- Accommodation services for young people and adults experiencing, or at risk of, homelessness, at St John of God Horizon House and Casa Venegas

St John of God Social Outreach's international health team also works with several Governments and Health Care providers in the Asia Pacific region:

- Timor-Leste – the team supports the Timorese government and counterparts to develop the capability of the health care workforce
- Papua New Guinea – St John of God Social Outreach operates the drop-in centre in the nation for people experiencing mental health issues

St John of God Accord

For over 65 years, St John of God Accord has worked to make a difference in the lives of people with disability. They specialise in supporting people with intellectual disability, providing a range of services across all metropolitan regions of Melbourne.

- Support coordination
- Therapy services
- Individualised services
- School leaver employment supports
- Disability employment services
- Short-term accommodation
- Supported independent living
- Accord Plus (after hours)

They supported 1116 clients in 2021-2022 in 37 accommodation houses and 45 sites in Melbourne's northern, eastern, western, and southern suburbs.

St John of God Health Care at Home

This service provides compassionate and timely health care from 10 service delivery centers to people in their own home following a hospital stay, so they can continue to receive expert assistance while benefitting from being in comfortable and familiar surroundings with those they love.

In 2021-22, we delivered more than 76,546 episodes of care.

Services are provided in metropolitan and regional WA and Victoria, and include:

- After hospital clinical care at home
- Postnatal home assistance for families who have recently welcomed a new baby

Rehabilitation in the home provided by therapists to enable patients to continue to build their strength and endurance after treatment or surgery in hospital.

Disability services

We provide disability services across 43 sites in Victoria through St John of God Accord and at a range of locations in New Zealand, through St John of God Hauora Trust.

St John of God Foundation

Our fundraising and philanthropic arm, called the St John of God Foundation, exists to provide support for state-of-the-art advancements in medical technology and research carried out at our hospitals. From the profound personal impact of tailored treatment, to the far-reaching effects of leading medical research, St John of God Foundation is helping transform both individual patient experiences and community health outcomes across Australia.

Group services and corporate functions

Our corporate head office is split with most functions managed from our office on Wellington Street, Perth and a small number of functions managed from St Kilda Road, Melbourne.

Our supply chain

As a Health Care organisation, our direct supply chain consists primarily health care service provision to our patients and community we operate in.

What we buy:

- Prosthetics
- Medical and surgical supplies
- Corporate services
- Facilities management
- Drugs and pharmaceutical products
- Clinical services
- Recruitment and agency
- Professional services
- Logistics
- Information and communication technology (ICT)
- Clinical capital, repairs and maintenance
- Food and beverages
- Energy and utilities (including fuel)
- Maintenance spares and services
- Marketing and advertising
- Equipment hire
- Fleet and vehicles

In 2020, we had 153 active contracts with approximately 4,800 suppliers.

In 2021, we had 201 active contracts with approximately 4,300 suppliers.

In 2022, we had 284 active contracts with approximately 4,266 suppliers.

We have long-term relationships with most of our suppliers, primarily located in Australia, comprising a significant portion of our total expenditure.

Our supply chain: Key statistics

Appx. 4,266 suppliers

~284 active contracts

15 categories

Reporting Criteria 3



Modern slavery risks in our operations and supply chain

Operational risks

St John of God Health Care has been operating for more than 125 years and is an integral part of the communities we serve.

Our Mission, Vision and Values set the foundation for a reflective and ethical culture. Our service ethos and deep belief in the dignity of the human individual are fundamental to our operations and guide decision-making.

In addition to external audit, we have a well-resourced and effective internal audit function that operates and reports to the Audit and Risk Committee. The focus of internal audit is on the key risks faced by the organisation. This is supported by integrated assurance, which is focused on building the systems that provide confidence that St John of God Health Care can reliably, repeatedly and efficiently understand and communicate changes in risks that matter.

Ongoing assessment of the adequacy and effectiveness of risk management systems is undertaken by the Board through its committees and various internal, external and regulatory agency reviews including the internal audit program.

A dedicated risk and compliance team are responsible for establishing and monitoring the systems that enable the key risk and compliance artefacts articulated by the board to be operationalised across the group.

Internal audits are undertaken in relation to specific areas of risk for the organisation. The internal audit program operates in accordance with an internal audit charter and an annual internal audit plan.

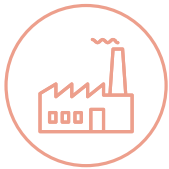
Areas of assurance are mapped against key risk areas as part of the annual internal audit planning process, ensuring targeted and effective reviews. Management responses to risk issues, and action plans to rectify identified or potential risks, are monitored to ensure effectiveness and appropriate implementation.

We have a Code of Conduct that all employees are required to abide by, which supplements our Mission, Vision and Values. Our goal is to ensure we provide the highest standards of care and support to patients and clients within an environment that ensures the behaviours and actions of caregivers comply with all regulatory and legislative requirements and are honest and transparent.

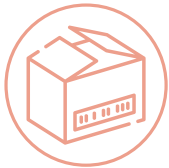
Our service ethos and deep belief in the dignity of the human individual are fundamental to our operations and guide decision-making.

Supply chain risks

In 2022, we identified our highest risk suppliers according to the risk indicators below.



Industry sector:
Specific industry sectors deemed as high risk in international and national guidance documentation.



Commodity/product:
Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.



Geographic location:
Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters.



Workforce profile:
In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as '3D' work (dirty, dull or dangerous)

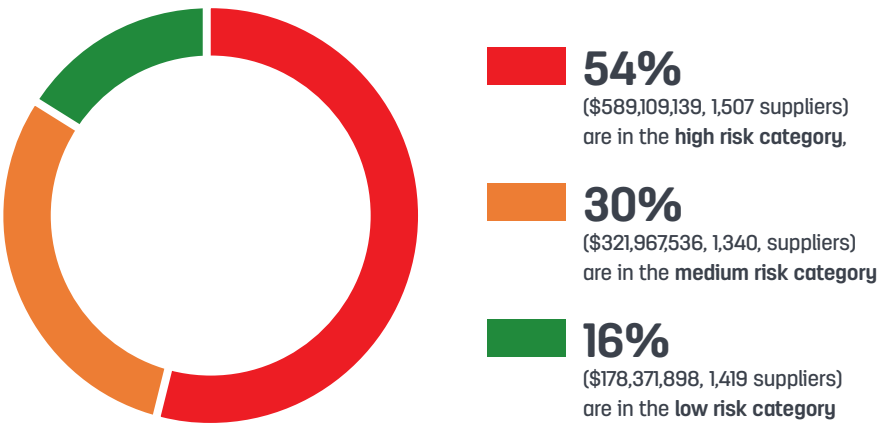
The total spend for the top 54% of suppliers for whom the risk assessment was completed amounts to \$589,109,139 million.

Using these categories above, we identified that the high risk spend is within five spend categories: prosthetics, medical and surgical supplies, facilities management, clinical capital repairs and maintenance, and fleet and vehicles (54% per cent).

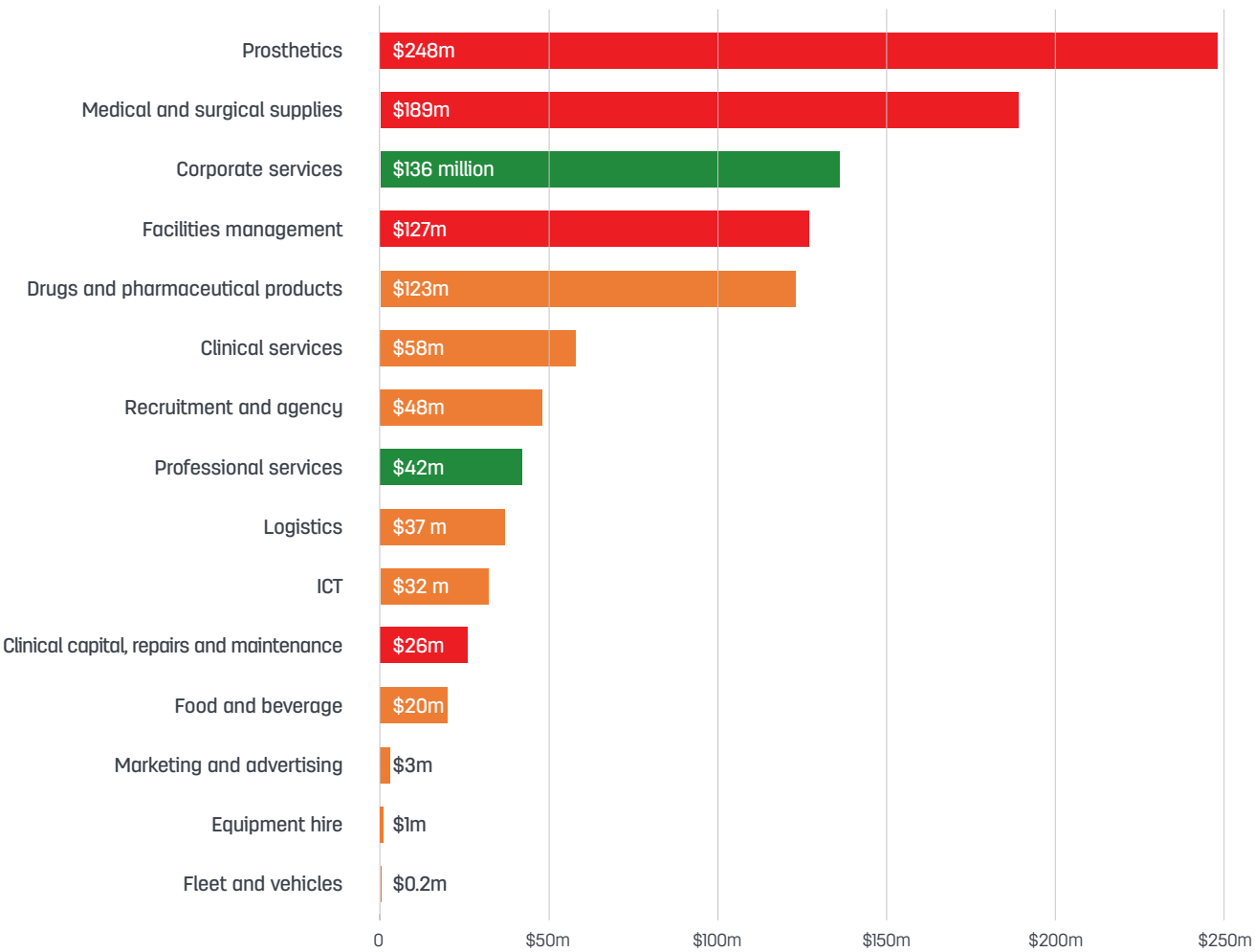
These four highest risk spend categories are made up of 1,507 suppliers out of 4,266 suppliers.

Our focus for 2022 has been on the top 75 suppliers within high risk categories, which we also extended to suppliers in two additional categories (PPE with spend of \$12 million and ICT with spend of \$32 million) with plans in place to extend our focus during the next 12 months.

Suppliers classed according to risk with total spend



Modern slavery risk by spend category:



Donations to St John of God Foundation

St John of God Health Care receives donations from members of the community and undertakes fund raising through St John of God Foundation.

We have a written procedure in place governing the acceptance, recording and acknowledgement of gifts. In addition to other things, this outlines responsibilities if there is suspected unethical or socially irresponsible behaviour and specifically references modern slavery as an example of unacceptable behaviour.

We undertake due diligence on all gifts valued at \$10,000 or more.

Our COVID-19 response

As a health care provider, St John of God Health Care has played a significant role working with State and Federal governments and their respective health departments to respond to the Coronavirus (COVID-19) pandemic.

Throughout the pandemic, there has been exceptional cooperation and collaboration across public and private health care providers.

The management of the COVID-19 pandemic at St John of God Health Care has always been in line with our Mission and Values, ensuring our ethic of care continues to inform all aspects of our health care,

community services, decision-making and response to the challenges the community faces.

COVID management progress significantly over the past year and St John of God Health Care have transitioned from a central response management team to two COVID-19 management teams, one in eastern Australia and one in western Australia.

The management of COVID-19 have transition to a business as usual activity under the management teams. Guidelines, policies and procedures are available on our internal and external facing sites. The COVID-19 Infection Prevention and Control Guidelines for management of patients was developed, including the use of personal protective equipment

(PPE) and other strategies across St John of God Health Care settings.

A six pillar management plan was developed for, vaccination, ventilation, testing, treatment, workforce, and wellbeing, focusing on the managing of COVID-19 in our hospital and services and encompass a collaborative approach from all areas of our organisation, including infection control, occupational health, safety and wellbeing and human resources.

St John of God Health Care, continues to be led by our supply and procurement team to manage supply for our critical services, undertaking the following actions:

- Performed an analysis across all new suppliers who claimed that they could provide PPE
- Reviewed the origin of the products before new suppliers are added to our supplier pool
- Performed clinical assessments and approval before PPE was is available to frontline staff
- Continue to manage supply delays and constraints to ensure that the risk are mitigated.

A six pillar management plan was developed for, vaccination, ventilation, testing, treatment, workforce, and wellbeing, focusing on the managing of COVID-19 in our hospital and services



Reporting Criteria 4

Actions taken to assess and address risk

Ansell engagement

On August 24, 2022, ABC published an article alleging that Ansell was knowingly profiting from slave labour at a Malaysian supplier. The article highlighted the exploitation of Bangladeshi and Nepalese migrant workers who were subjected to alleged slavery-like conditions, such as having their identity papers taken away, paying excessive recruitment fees to agents, experiencing physical punishment, working long hours, and being exposed to dangerous substances, poor food, and accommodation. The US Customs and Border Protection found ten out of eleven United Nations indicators of forced labour and slavery present at the supplier.

As a member of the Australian Catholic Anti-Slavery Network (ACAN), St John of God Health Care became alarmed and decided to engage with Ansell in a unified approach through ACAN. ACAN met with Ansell representatives twice in 2022, on September 7 and December 8, and has scheduled further meetings for 2023, the first of which is on February 21.

The engagement is intended to foster collaboration with Ansell to remove the risk of slavery in their supply chain. ACAN discussed issues related to supplier compliance programs, supplier capacity building, and recruitment fees in migrant worker departure countries, wages, accommodation, grievance mechanisms, victim support, and consequences.

They also discussed establishing regular update meetings between ACAN and Ansell, establishing a joint commission or working group to oversee progress, requesting an observer seat at the Responsible Glove Alliance meetings, inviting ACAN to attend some human rights due diligence or social audits on-site, developing joint capacity building projects, and exploring alternative sources for materials, production locations, and even reshoring of production.

While none of these ideas have materialised yet, the engagement with Ansell is a positive step forward, and ACAN expects to use it as a model for engagement with other suppliers, especially those who wish to be true partners.

Modern slavery gap analysis

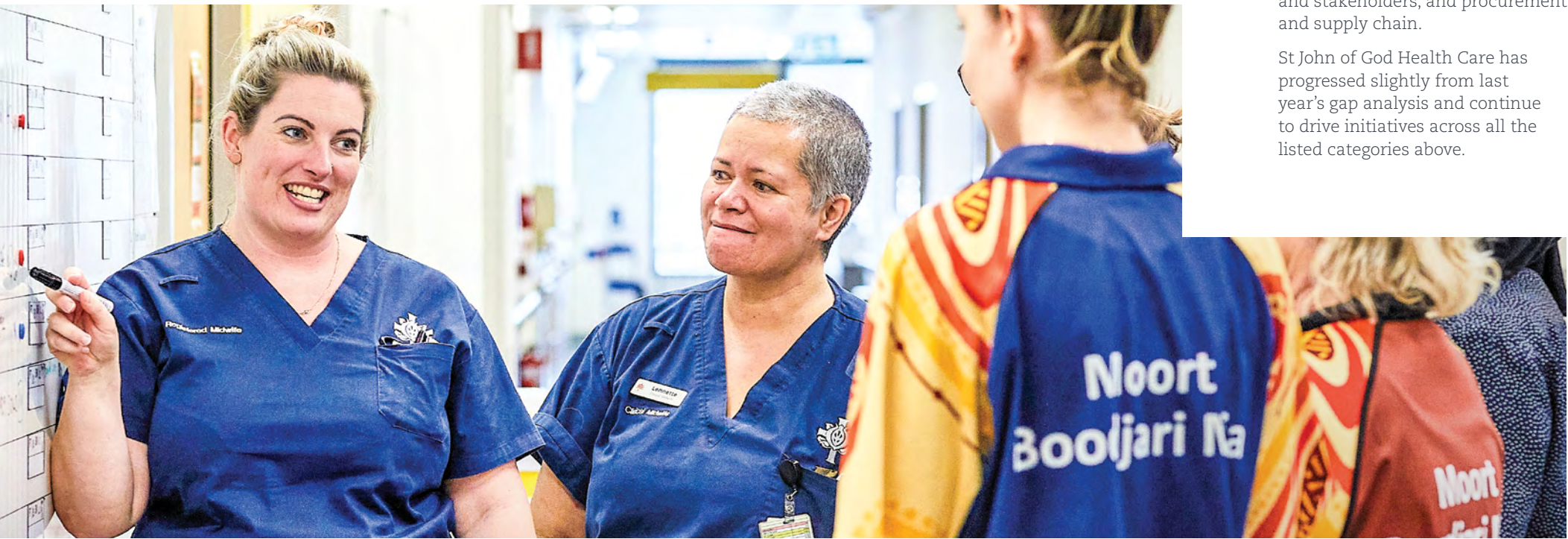
St John of God Health Care commenced action to assess and address the risks of modern slavery in more detail during 2022 across our top 75 suppliers.

We conducted a maturity/ gap review during March 2023 to measure against our previous gap assessment on how we are tracking in our approach to the modern slavery risks.

The results showed a small improvement across nine areas with no change across 13 areas across the key indicators of management systems, risk management, human resources and recruitment, customers and stakeholders, procurement and supply chain.

St John of God Health Care has progressed slightly from last year's gap analysis and continue to drive initiatives across all the listed categories above.

Indicator / target	Progress by calendar year			
	2020	2021	2022	2023 (Planned)
Management systems:				
Governance	<div></div>	<div></div>	<div></div>	<div></div>
Commitment	<div></div>	<div></div>	<div></div>	<div></div>
Business systems	<div></div>	<div></div>	<div></div>	<div></div>
Action	<div></div>	<div></div>	<div></div>	<div></div>
Monitor and report	<div></div>	<div></div>	<div></div>	<div></div>
Risk management				
Risk management framework	<div></div>	<div></div>	<div></div>	<div></div>
Operational risk		<div></div>	<div></div>	<div></div>
Identifying external risk	<div></div>	<div></div>	<div></div>	<div></div>
Monitoring and reporting risk	<div></div>	<div></div>	<div></div>	<div></div>
Human resources and recruitment				
Awareness	<div></div>	<div></div>	<div></div>	<div></div>
Polices and rystems	<div></div>	<div></div>	<div></div>	<div></div>
Training	<div></div>	<div></div>	<div></div>	<div></div>
Labour hire/ outsourcing	<div></div>	<div></div>	<div></div>	<div></div>
Customers and stakeholders				
Customer attitude	<div></div>	<div></div>	<div></div>	<div></div>
Information provision	<div></div>	<div></div>	<div></div>	<div></div>
Feedback mechanisms	<div></div>	<div></div>	<div></div>	<div></div>
Worker voice	<div></div>	<div></div>	<div></div>	<div></div>
Procurement and supply chain				
Policy and procedures	<div></div>	<div></div>	<div></div>	<div></div>
Contract management	<div></div>	<div></div>	<div></div>	<div></div>
Screening and traceability	<div></div>	<div></div>	<div></div>	<div></div>
Supplier engagement	<div></div>	<div></div>	<div></div>	<div></div>
Monitoring and corrective action	<div></div>	<div></div>	<div></div>	<div></div>



Progress has been made across our 2022 initiatives as highlighted below:

Modern slavery working group

We continued working as a cross-functional working group from supply and procurement, workforce, legal, international health and corporate affairs.

Partnered with other Catholic health care and education providers

We recommitted to the Australian Catholic Anti-Slavery Network (ACAN) to leverage their strength and expertise across Australia’s large network of Catholic hospitals and aged care service providers.

We also continued to work with the Catholic Network Alliance (CAN) Joint Procurement Network (JPN) to engage with suppliers collaboratively.

We continued our partnership with ACRATH via our Formation team across a range of events to promote awareness of modern slavery and specifically human trafficking.

We partnered with ACAN and University of Notre Dame – School of Law and Business and presented at the Eminent Speaker Series, discussing the Opportunity for Business to Respect and Protect Human Rights and shared lessons learnt.

We partnered with Catholic Mission during their Christmas Reflection to highlight what St John of God Health Care have done in the anti-slavery space to inform their community awareness programs.

International Day for Abolition of Slavery

Communication and awareness – As a Catholic ministry, we at St John of God Health Care believe in personal freedom and the intrinsic and unique dignity of every person. We have zero tolerance for modern slavery and the exploitation of people in any form. We recognise that this can be insidious and difficult to detect, particularly within supply chain management, and we apply principles of good corporate governance and foster an ethical and responsible organisational culture to reduce the risk.

Supplier surveys

As part of ACAN and CNA, we expanded our previous survey of our top 50 suppliers to the top 75 (66% of annual spend) to understand their procurement and sourcing practices. We received 33 comprehensive responses and continue to work with our remaining top suppliers to address modern slavery supply chain risks in more detail.

Risk assessment and framework

Following the extension of our risk assessment to include the 4,266 suppliers, we will continue to review and update the analysis as we improve our understanding of the supply chain risk in their environment.

We expanded the work done identifying and conducting a taxonomy risk assessment of our top 565 suppliers to 4,266 suppliers. We continue to invite our leading tier suppliers to join the SEDEX platform to work together to understand modern slavery risk in the supply chain. 19 of our top suppliers have joined the platform to date with 3 supplier preferring to engage with St John of God Health Care from outside the platform.

Ethical sourcing guidelines

The ethical sourcing guidelines and *Socially Responsible and Ethical Business Practice Statement* have been reviewed and updated. The latest statement is included with every new Blanket Purchase Agreement that is provided to our service providers who operate under such agreements.

Supplier Code of Conduct

We review the *Suppliers Code of Conduct*, which provides guidelines on the practices, behaviour and other requirements we expect of our suppliers, including compliance with ethical sourcing on an annual basis. The supplier code of conduct is available on internal and external platforms for visibility and as information on how to engage with St John of God Health Care.

Modern slavery policy

The *Modern Slavery Policy* annual review was completed in February 2023. No changes was identified to be added to the policy during the review period.

Education and training

All members of the working group undertook *Modern Slavery 101, Business Readiness and Grievance Mechanisms and Remedy training*, developed by ACAN, to build organisational understanding and knowledge. We have also included the five training modules *Modern Slavery 101, Business Relevance, Implementing a Modern Slavery Risk Management Program, Grievance Mechanism and Remedy, and Modern Slavery Risk management for Suppliers* training in our learning and development platform.

We plan to extend the training to a broader group of facilities management, procurement and supply chain and human resource management teams during the next period to improve knowledge and awareness on modern slavery practices across the organisation

Governance and reporting

We have continued standardised, regular reporting to the St John of God Health Care Board Audit and Risk Committee (ARC) to ensure scrutiny and oversight.

Our current reporting framework provides information on spend, risk, and contracts by supplier and category. We will work towards enhancing this framework to ensure that it remains relevant and effective in identifying and addressing modern slavery risks. We also highlight specific risks once we become aware or identify the risk to our supply chain. (Example - Ansell Engagement)

In line with our zero-tolerance stance on modern slavery, we will actively monitor our grievance and whistleblowing platforms to address any concerns raised by internal or external parties. By doing so, we aim to provide a safe and confidential platform for individuals to voice their concerns and help us maintain the highest standards of ethical conduct across our operations.

Change impact assessment

We completed a re-assessment of changes needed across St John of God Health Care. As a result, we identified

additional areas impacted by modern slavery practices and have taken steps to implement internal changes to identify and address modern slavery.

Vendor onboarding

We re-assessed the process and documentation for onboarding new vendors and modern slavery is explicitly stated as a focus. Vendor onboarding links directly to the St John of God Health Care Supplier Code of Conduct.

We have included modern slavery commitments in our supplier onboarding online application, and expect all new suppliers to be aware of the St John of God Health Care focus on modern slavery during the onboarding process.

Remedy

St John of God Health Care is committed to providing appropriate and timely remediation to individuals affected by modern slavery in accordance with the need of the victim and relevant laws and guidelines, including the UN Guiding Principles on Business and Human

Rights and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

Domus 8.7, a not-for-profit initiative, has been established to provide remediation services, support, and advisory for victims. It triages cases, refers victims to specialists, partners with international organisations, and builds capacity within the Catholic community. Through Domus 8.7, St John of God Health Care aims to achieve outcomes that improve risk management and operational response.

Grievances related to modern slavery are mediated through Domus 8.7, and St John of God Health Care is committed to working with entities that caused harm to ensure remediation and prevention. Staff and stakeholders are trained to identify cases of modern slavery. No cases of modern slavery were found in 2022.

(Domus 8.7 is an initiative by the Catholic Archdiocese of Sydney assisting workers, businesses or community members to obtain support, advice and guidance on how to respond to suspected or actual situations of modern slavery.)



We aim to provide a safe and confidential platform for individuals to voice their concerns and help us maintain the highest standards of ethical conduct across our operations.

Modern slavery action plan and roadmap



Action plan

We have a 5 year roadmap with an action plan in place, which outlines initiatives across due diligence, monitoring and reporting, training and awareness-raising, risk management and compliance and communication.

Year 1 2019 (Awareness and Mobilisation)	Year 2 2020 (Approach)	Year 3 2021 (Extend and Involve)	Year 4 2022 (Effectiveness Review and Monitoring)	Year 5 2023 (Effectiveness Review and Monitoring)
Establish working group	Conducted risk assessment and gap analysis	Review approach/ framework	Improve communication and awareness campaign	Improve communication and awareness campaign
Review and understand obligations under the Act	Performed a change impact assessment	Extend risk assessment beyond Tier 1 Suppliers	Improve supplier engagement and communication	Improve supplier engagement and communication
Engaged with Catholic peer and industry groups	Reviewed St John of God Health Care Code of Conduct and existing policies relating to investment, donations, and whistleblower and developed new Modern Slavery Policy and processes as required.	Review goals, targets and KPI's	Extend SEDEX adoption across all tier 1 suppliers	Continue to extend SEDEX adoption across all tier 1 suppliers.
Undertook due diligence activities	Established regular reporting	Complete all top 50 suppliers' contract variations.	Rollout modern slavery training to a broader group of caregivers	Continue to rollout modern slavery training to a broader group of caregivers
Engaged Board and Audit and Risk Committee.	Engaged with high priority tier 1 suppliers (top 50)	Review and update our supply risk assessment and present progress	Revisit assessment and show maturity improvement.	Revisit assessment and show maturity improvement.
Established communication with ACAN	Updated governance framework	Implement Modern Slavery 101 training for caregivers as identified through gap analysis and change impact	Operationalise supplier risk assessment	Continue to operationalise supplier risk assessment beyond the procurement and supply chain team.
Identified top tier suppliers	Develop and deployed initial training for working group	Extend the inclusion of the modern slavery clauses into next 50 suppliers	Embed supplier engagement on modern slavery practices and supply chain risk in annual/ quarterly contract review meetings	Continue to embed supplier engagement on modern slavery practices and supply chain risk in annual/ quarterly contract review meetings
Commenced engagement with suppliers to commit to ethical sourcing	Conducted system maturity review and established a baseline	Confirm changes to policy and procedures with all Facilities Managers and ensure 100% compliance	Improve supplier annual performance measures to include modern slavery risks and feedback from regular meetings.	Continue to improve supplier annual performance measures to include modern slavery risks and feedback from regular meetings.

Year 1 2019 (Awareness and Mobilisation)	Year 2 2020 (Approach)	Year 3 2021 (Extend and Involve)	Year 4 2022 (Effectiveness Review and Monitoring)	Year 5 2023 (Effectiveness Review and Monitoring)
Formed working group	Identified KPIs	Revisit Bridge the Gap assessment and show maturity improvement.	Extend modern slavery to a broader group of caregivers.	Continue to extend modern slavery to a broader group of caregivers.
	Launched awareness and communication campaign	Implement modern slavery training for key caregivers in St John of God Health Care learning and development curriculum.		Actively engage with CNA through the various established forums to engage suppliers jointly to manage modern slavery risk across supply chains.
	Changed the vendor onboarding process and documentation	Updated Agreement and RFx templates to include modern slavery clauses		Continue to engage with ACAN and other Catholic peers to identify, understand and refine our modern slavery risk management practices
	Commenced contract reviews for the top 50 suppliers to include the modern slavery clauses.	Revisited Change Impact Assessment		Refine the modern slavery reports on the analytics portal and provide access to the reports for the executive and operations teams where appropriate.
	Reviewed the supply chain risk associated with COVID-19 and undertook range of actions	Added top 25 suppliers to SEDEX platform		Create a Modern Slavery KPI Dashboard to measure and monitor supply chain risk, supplier engagement and performance across our supply chain
	Reviewed and updated the Supplier Code of Conduct and published on St John of God Health Care website.	Reviewed modern slavery policies and procedures		
	Prepared first Modern Slavery Statement	Partnered with ACRATH to communicate the impact of modern slavery to improve awareness across SIGHC		





Reporting Criteria 5

Effectiveness assessment

Our modern slavery governance and risk management action plan will be reviewed on a regular basis as part of our audit and risk management review process.

Our Audit and Risk Committee (ARC) meets on a regular basis to review and potential risk in our organisation and provide guidance and propose mitigation actions for all the risk identified in across our organisation as a whole.

Assessing the effectiveness of our actions is an important actions to manage and mitigate modern slavery risks in our operations and supply chain. We plan to develop specific measures during the next period to ensure that we track progress and identify any potential risk proactively.

For the first reporting period we have assessed the effectiveness of our actions against the following key process indicators:

Indicator/ Target	Achieved
Re-assessed the business maturity across the main modern slavery criteria	✓
Extended the <i>Supplier Risk Assessment</i> across a broader range of supplier and categories	✓
Progressed with the inclusion of the modern slavery terms across Top Tier, PPE and ICT Suppliers	✓
Continue partnership with ACRATH to communicate the impact of modern slavery to improve awareness across SJGHC	✓
Continued partnership with ACAN and CNA partners for a further term.	✓
Reviewed and updated modern slavery policies and procedures	✓
Added/ on-boarded top 25 Suppliers to the SEDEX platform	✓
Extended partnerships with University of Notre Dame, Catholic Mission and Catholic Health on key initiatives	✓
Detail risk assessment across 33 key suppliers	✓
Improved spend and taxonomy category spend visibility	✓
Maintained and communicated awareness on modern slavery principles and key events during the period	✓



Reporting Criteria 6

Process of consultation with owned or controlled entities

The controlled entities are listed in the disclosure statement at the front of this document. They all operate under the direction and governance of St John of God Health Care Inc and share the same executive management.

Reporting Criteria 7

Any other relevant information

No additional material included in this statement.



