

Every moment matters



Modern Slavery Statement

Statement for period 1 January 2025 to 31 December 2025



Acknowledgement of Country



St John of God Health Care acknowledges and pays respect to the Traditional Custodians of the lands on which we work and live. We offer our respect to Elders, past and present, and recognise their cultural heritage, beliefs and continuing connection to Country. We express our gratitude that we share this land today. We also acknowledge the pain of history and commit to creating a path of healing. We hope and believe that we can move to a place of equity, justice and partnership together.



A collaborative artwork by the Djookanka Sisters and St John of God Health Care caregivers

Disclosure notes

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 Hawkesbury handed back to NSW on 1 July 2024)

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)

Marillac (ACN 050 463 717) together, for the purposes of this statement “St John of God Health Care”.

St John of God Health Care Inc ARBN: 051 960 911

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Statement from the Board Chair and Group CEO

St John of God Health Care is guided by our Mission and Values of Hospitality, Compassion, Respect, Justice and Excellence. These values shape how we care for people and how we act, including our responsibility to uphold human dignity in the way goods and services are sourced.

We stand against modern slavery and exploitation in any form, recognising these harms are often hidden within complex global supply chains and require ongoing vigilance. This includes working closely with suppliers and partners to strengthen transparency, uphold human rights, and support fair and responsible sourcing practices.

We are proud to present our sixth Modern Slavery Statement, reflecting the progress made in strengthening our understanding of modern slavery risks and the actions taken to address them.

Capability has continued to grow, with no material incidents identified through reporting and assurance processes during 2025.

During the reporting period, governance, supplier engagement, risk visibility and remediation capability were further strengthened. Our modern slavery program continues to demonstrate consistent capability across key areas, with steady performance reflected in our latest assessment. Encouraging progress has been made in worker engagement and operations, strengthening how risks are managed in day-to-day practice.

Our approach is supported through ongoing collaboration with the Australian Catholic Anti-Slavery Network (ACAN), Catholic Health Australia (CHA) and the Catholic Negotiating Alliance (CNA), alongside continued improvement across our operations and supply chains.

This Statement reflects our clear responsibility to protect human dignity and to take meaningful, sustained action to prevent modern slavery in all its forms.



Hon Kerry Sanderson AC CVO
Board Chair



Bryan Pyne
Group Chief Executive Officer

This Statement was approved by the Board of St John of God Health Care Inc, the principal governing body on 29 May 2026 and signed by the Board Chair and Group Chief Executive Officer in accordance with the Modern Slavery Act 2018 (Cth).

About us

St John of God Health Care is a leading not-for-profit, for-purpose provider of high-quality health care and community services. We play a vital role in Australian health care and exist to benefit the community by supporting our patients, our caregivers, and those with the greatest unmet health needs.

Our commitment to compassionate, Mission-driven care runs deep. Established in 1895 by the Sisters of St John of God, we remain inspired by their generous spirit to go beyond what might be expected.

Today, we are one of Australia's largest private hospital operators and not-for-profit Catholic health care providers. We employ more than 15,000 dedicated caregivers across Australia, New Zealand and the wider Asia-Pacific region. We operate 25 outstanding health care facilities with more than 3,200 beds and provide a wide range of free community wellbeing support services, health care at home and disability services.



Our Symbol

The pomegranate symbol represents our heritage — as the original symbol of the Sisters of St John of God — and our Vision for the future. The cross is the symbol of Christianity, reminding us of Jesus' suffering and our call to follow in His footsteps. Our five Values are reflected in the five seeds of the pomegranate, which is open to allow the seeds to scatter, providing new life and symbolising the generosity of self-giving to people in need.



25

facilities



15,000+

caregivers



3,200

beds



\$2.2b

revenue

As at 30 June 2025

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.



Service Ethos

Service is central to how we bring the Mission to life at St John of God Health Care. Our development programs aim to support and equip our caregivers with contemporary and best in class capability in providing exceptional service.

The key tenets of our Service Ethos are:

- Our Mission inspires our service – we are continuing a great story of service entrusted to us by our founders.
- Relationships are central – every encounter is an opportunity and can have far-reaching effects.
- The way we work together as a community, in our own teams and with other teams, is integral in our effectiveness.
- Governance and management of resources are key to our success.
- Feedback and evaluation about how well we are doing is crucial.





Reporting Entities

Mandatory Criteria 1 — Identify the reporting entity

This joint statement is submitted by St John of God Health Care Inc (ARBN 051 960 911) as the principal reporting entity on behalf of itself and the entities it owns or controls, in accordance with section 14 of the Modern Slavery Act 2018 (Cth).

The principal reporting entity is St John of God Health Care Inc, a body corporate registered under the Corporations Act 2001. It is the parent entity of the group and is responsible for the preparation, approval and submission of this statement.

There were no material changes to the reporting entities during 2025. St John of God Hawkesbury District Health Campus Ltd (ACN 608 054 379) was transferred to NSW Health on 1 July 2024 and is no longer included as a reporting entity.

The following table lists all reporting entities covered by this statement:

Reporting Entities Covered by this Statement

Entity Name	ABN/ACN	Role
St John of God Health Care Inc	ARBN 051 960 911	Principal reporting entity
St John of God Outreach Services	ACN 064 831 965	Controlled entity
St John of God Foundation Inc	ARBN 066 805 132	Controlled entity
St John of God Midland Health Campus Ltd	ACN 152 874 845	Controlled entity
Dencross Pty Ltd	ACN 086 647 298	Controlled entity
St John of God Berwick Health Campus Ltd	ACN 606 404 915	Controlled entity
St John of God Marillac	ACN 050 463 717	Controlled entity



Our Structure, Operations and Supply Chains

Mandatory Criteria 2 — Describe structure, operations and supply chains

How our modern slavery response fits within the St John of God Health Care Strategy.

St John of God Health Care's approach to modern slavery is embedded within its broader strategic, governance and ethical framework. The Modern Slavery & Ethical Supply Chain Framework translates organisational values and ESG commitments into practical, risk-based action across operations and supply chains.

Strategic Alignment

SJGHC's modern slavery response operates across four interconnected strategic layers: together, these layers ensure modern slavery risk management is not treated as a standalone compliance activity, but an integrated component of SJGHC's mission-driven strategy and enterprise risk approach.



Strategic Priorities: see our 2024-25 Annual Report <https://www.sjog.org.au/about-us/annual-report>

#	Strategic Layer	Description
1	Enterprise Strategy	Board and executive strategic priorities that guide organisational direction, performance and accountability.
2	ESG Roadmap (Social Pillar)	Commitment to human dignity, community wellbeing and ethical operations.
3	Modern Slavery & Ethical Supply Chain Framework	Risk-based framework that operationalises ethical sourcing and modern slavery commitments.
4	Annual Operating Plans & Delivery	Year-by-year implementation, monitoring and continuous improvement.

Governance and Organisational Structure

Organisational Structure

St John of God Health Care is a not-for-profit Catholic health care provider operating under a robust, two-tiered governance structure that ensures ethical leadership, accountability and strategic oversight.

- Trustees hold canonical responsibility and safeguard the organisation's Mission, Values and adherence to Catholic health care principles.
- Board of Directors is responsible for stewardship, strategic direction, financial sustainability and enterprise risk management.
- Executive Management, led by the Group Chief Executive Officer, oversees day-to-day operations and implements Board-approved strategies and frameworks.

This structure supports consistent oversight of modern slavery risks across SJGHC's operations and supply chains.

Governance Framework and Oversight

The Board is supported by Board Committees, including the Audit and Risk Committee (ARC), which provides independent oversight of:

- Risk management frameworks
- Regulatory and legislative compliance, including modern slavery obligations
- Internal controls, audit processes and reporting integrity

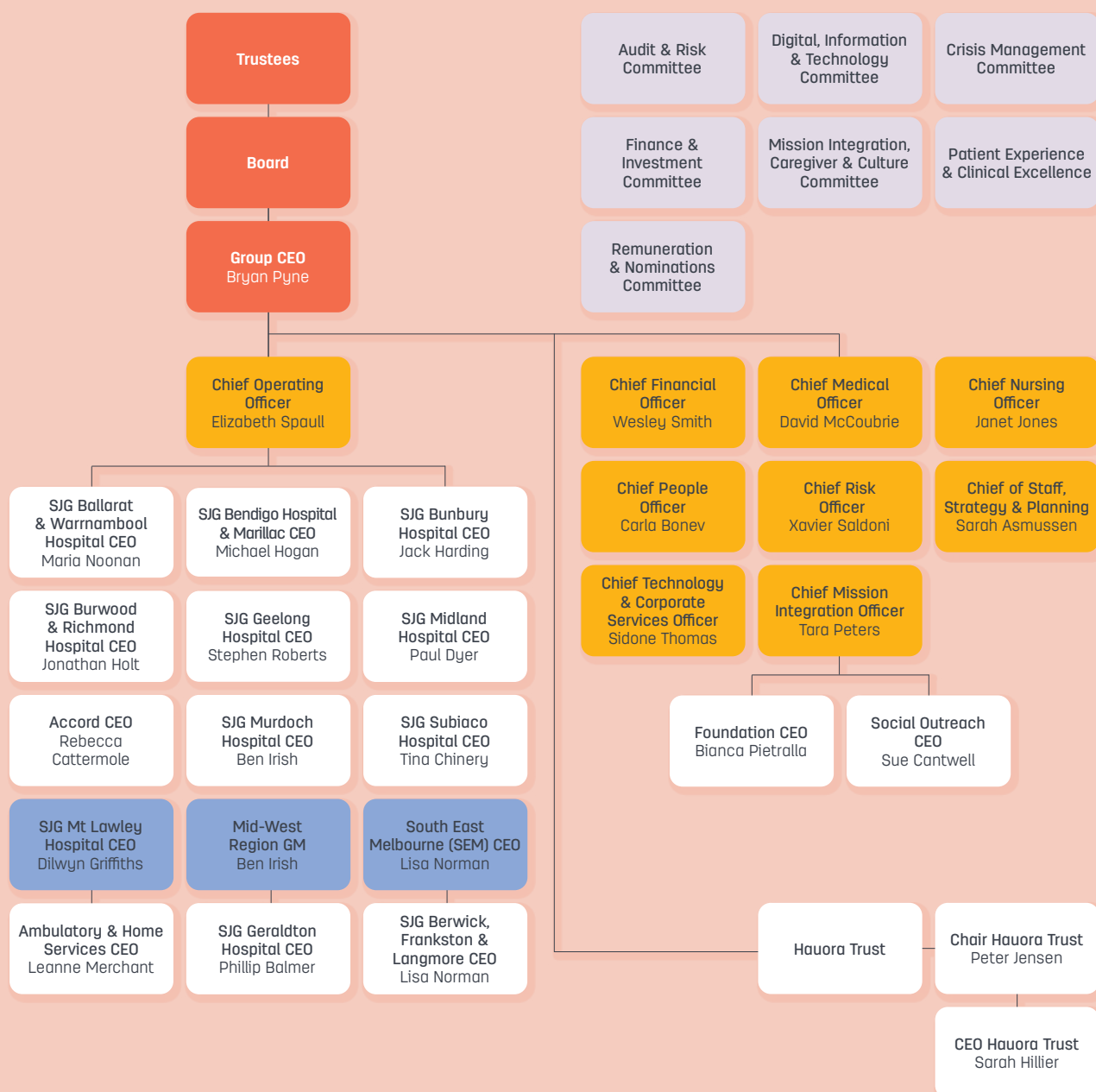
Modern slavery risk is managed alongside other material organisational risks through established governance, risk and compliance processes.

SJGHC applies recognised principles of good corporate governance, drawing on guidance from bodies such as the **ASX Corporate Governance Council**, to promote transparency, ethical procurement, financial integrity, workforce accountability and patient safety.

Roles, Responsibilities and Accountability

Clear accountability is maintained through formal governance instruments, including the St John of God Health Care Inc. Constitution, the Governance Authority Matrix, and the Management Authority Matrix. These documents define the delegated responsibilities of Trustees, the Board and management, ensuring clarity in decision-making, leadership accountability and implementation of ethical supply chain practices.

Organisational structure



Services

Our comprehensive services span a broad range of health and community care:

- **Medical and Surgical Services**
High-quality medical and surgical treatments across various specialties.
- **Mental Health Care and Therapy**
Inpatient and outpatient mental health services, including psychology, psychiatry and counselling.
- **Rehabilitation**
Comprehensive rehabilitation programs to support recovery from injury, illness or surgery.
- **Maternity**
Expert maternity care, including pregnancy, birth and postnatal services.
- **Cancer Care**
Comprehensive oncology services, including chemotherapy, radiation therapy and supportive care.
- **Cardiac Services**
Specialised heart care, including interventional cardiology and cardiothoracic surgery.
- **Emergency Medicine**
24-hour emergency departments providing immediate care for acute illnesses and injuries.
- **Allied Health Services**
A range of services including physiotherapy, occupational therapy, dietetics and speech pathology.
- **Palliative Care**
Compassionate support for patients with life-limiting illnesses.
- **Home Nursing**
Professional nursing care provided in the comfort of patients' homes.
- **Disability Support Services**
Assistance and services tailored to individuals with disabilities.
- **Telehealth Services**
Remote medical consultations and health care support through digital platforms.
- **Social outreach programs**
Homelessness support, drug and alcohol services, family services.
- **Public-private partnership hospital (Midland)**





Geographic Presence

St John of God Health Care operates across multiple Australian states and territories. Head Office is located at Level 1, 556 Wellington Street, Perth WA 6000.

- **Western Australia (Perth Metropolitan)**
Subiaco Hospital, Murdoch Hospital, Mt Lawley Hospital, Midland Public and Private Hospitals.
- **Western Australia (Regional)**
Bunbury Hospital, Geraldton Hospital.
- **Victoria**
Ballarat Hospital, Bendigo Hospital, Berwick Hospital, Geelong Hospital, Warrnambool Hospital, Frankston Rehabilitation Hospital, Langmore Centre (mental health).
- **New South Wales**
Burwood Hospital (mental health), Richmond Hospital (mental health).
- **New Zealand**
Halswell (Christchurch), Wellington.
- **Asia-Pacific**
Social Outreach presence in Timor-Leste.

Our People

St John of God Health Care employs more than 15,000 caregivers across Australia and the Asia-Pacific region. We are a values-driven and inclusive organisation that recognises and celebrates the diverse skills, experiences, and perspectives of our caregivers.

49.8%

of our workforce are professional nurses and midwives

79.24%

of caregivers are female

50%

of our Senior Executive are female

4,708

accredited specialist doctors provide care in our hospitals

929

volunteers support patients and visitors, contributing to a welcoming and compassionate environment

58

caregivers identify as Aboriginal

11

caregivers have disclosed a disability

As at 30 June 2025

Our Operations

The organisation operates 14 private hospitals across Western Australia, Victoria and New South Wales, specialising in acute care with renowned services in maternity, oncology and orthopaedics. This includes three specialist mental health hospitals and a dedicated rehabilitation hospital. Additionally, the organisation manages St John of God Midland Public Hospital under a public-private partnership. Collectively, these hospitals offer 3,288 beds.

In FY2024-25, our hospitals treated over 409,493 overnight and same-day patients and delivered more than 10,609 babies, maintaining our status as the largest provider of private maternity services in Western Australia.

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. Delivered by St John of God Social Outreach, these services are offered across 56 locations in Australia, either for free or at a low cost.

Social Outreach supported 5,946 individuals and provided 22,732 nights of stable accommodation. Services include community mental health counselling, specialist mental health support for new parents (Raphael Services), drug and alcohol services, and accommodation for those experiencing or at risk of homelessness (Horizon House and Casa Venegas). Internationally, teams collaborate with governments in the Asia-Pacific region, notably supporting workforce capability development in Timor-Leste.

St John of God Accord

For over 65 years, St John of God Accord has supported people with disabilities, specialising in individuals with intellectual disabilities across metropolitan Melbourne. Services include support coordination, therapy services, individualised support, school leaver employment supports, disability employment services, short-term accommodation, supported independent living and Accord Plus (after-hours programs). In FY2024-25, Accord supported 817 clients across 54 sites.

Healthcare at Home

This service provides compassionate and timely health care from 10 service delivery centres to individuals in their own homes following hospital stays, allowing them to continue receiving expert assistance while benefiting from familiar surroundings. In FY2024-25, the service delivered care to more than 67,523 patients across their care journey. Services include after-hospital clinical care, postnatal home assistance, and rehabilitation provided by therapists.

St John of God Foundation

St John of God Health Care's fundraising and philanthropic arm, the St John of God Foundation, supports advancements in medical technology and research conducted at our hospitals. From the personal impact of tailored treatment to the far-reaching effects of leading medical research, the Foundation helps transform both individual patient experiences and community health outcomes across Australia.

Supply Chains

Our supply chains span medical devices and consumables, pharmaceuticals, ICT equipment, facilities management, labour services, food services, textiles and major capital works.

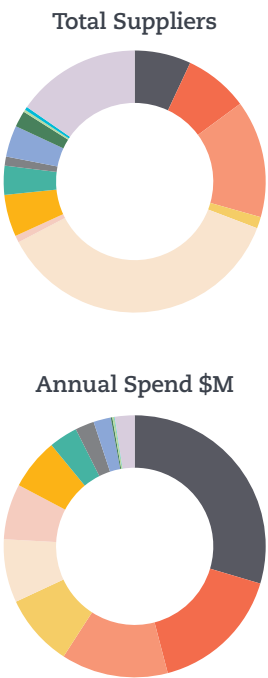
During 2025, our supply chain comprised 3,747 total suppliers across 40 supply categories, with total spend of approximately \$1.039 billion concentrated in medical devices and supplies (\$307.3M), healthcare services (\$169.8M), facility management (\$137.0M), building and construction (\$92.8M), professional services (\$81.1M), drugs and pharmaceuticals (\$71.3M), ICT hardware, software and services (\$65.7M), labour hire (\$36.7M), utilities (\$24.3M), food and catering services (\$22.3M), cleaning and security services (\$2.0M), transport, logistics and warehousing (\$2.5M), uniforms and PPE (\$0.5M), and other categories (\$25.4M).

A significant proportion of medical devices and consumables are sourced from manufacturers based in the United States, Europe and Asia. Many of these products involve complex global supply chains, including raw material sourcing and manufacturing processes in countries with elevated modern slavery risk indicators.

Supply Chain by ACAN Taxonomy Category (2025)

Category	Suppliers	Spend
Medical devices and supplies	261	\$307.3M
Healthcare services and distribution	297	\$169.8M
Facility management and property maintenance	543	\$137.0M
Building and construction	53	\$92.8M
Professional services	1,369	\$81.1M
Drugs and pharmaceuticals	32	\$71.3M
ICT hardware, software and services	194	\$65.7M
Labour hire	134	\$36.7M
Utilities	42	\$24.3M
Food and catering services	145	\$22.3M
Cleaning and security services	75	\$2.0M
Transport, logistics and warehousing	11	\$2.5M
Uniforms and PPE	15	\$0.5M
Other categories	576	\$25.4M

Table 1 Supply chain taxonomy 2025



Historical Procurement Trends (2020–2025)

Year	Active Contracts	Modern Slavery Term	Spend (\$M)	Suppliers	Percentage in Australia	Total 80% Spend
2020	153	—	\$760M	4,800	98%	179
2021	201	55	\$808M	4,300	98%	175
2022	284	65	\$1,089M	4,266	97%	175
2023	376	91	\$949M	4,093	95%	190
2024	476	298	\$987M	3,918	95%	180
2025	500+	348	\$1,039M	3,747	95%	~185

Table 2 St John of God Health Care procurement trends 2020 to 2025.

Supplier Expectations and Compliance

St John of God Health Care requires its suppliers and vendors to implement robust policies and processes that prevent modern slavery, uphold human rights and ensure ethical sourcing across all levels of the supply chain. Our Code of Conduct extends expectations to all third-party partners, reinforcing our zero-tolerance approach to modern slavery and unethical practices.

Due diligence measures include strengthened contractual requirements, mandatory supplier declarations and ongoing monitoring to identify and address potential risks.

Key Sourcing Categories

St John of God Health Care procures a diverse range of products and services. The key procurement categories include:

- **Medical and Clinical Supplies**
Pharmaceuticals, medical consumables (syringes, gloves, PPE, wound care), surgical instruments, diagnostic and imaging equipment, patient monitoring systems.
- **Health Care Technology and Digital Solutions**
Medical software, clinical decision support, telehealth platforms, cybersecurity solutions, network and infrastructure services.
- **Hospital and Facility Management**
Medical waste management, cleaning and hygiene products, hospital catering and nutrition, laundry and linen services, utilities.
- **Capital Equipment and Infrastructure**
Hospital beds and patient furniture, building construction and maintenance, facility upgrades, medical transport and logistics.
- **Corporate and Professional Services**
Legal and compliance, human resources and labour hire, financial services, marketing, education and training providers.
- **Social and Community Services Procurement**
Community mental health services, disability support equipment, emergency response and outreach, housing and accommodation for vulnerable populations.





Modern Slavery Risks

Mandatory Criteria 3 — Describe the risks of modern slavery practices

Modern slavery risks may arise in both our operations and supply chains. In assessing these risks, we consider factors including geographic origin of goods, industry and sector risk indicators, workforce composition, use of subcontracting, and the vulnerability of workers within supply chain tiers.

We apply a tiered risk assessment methodology informed by ACAN guidance, sector collaboration, the Global Slavery Index, Sedex supplier self-assessment questionnaires (SAQs), and category-level risk profiling. This methodology allows us to prioritise engagement with suppliers in higher-risk categories.

In 2025, 77.6% of total supply chain spend was classified as high-risk on a category-based risk classification approach at procurement category level, with 52.6% of suppliers (by count) in high-risk categories. This concentration reflects the nature of healthcare procurement, where medical devices and facility services dominate expenditure and often involve complex, multi-tier global supply chains.

Risk Assessment Methodology

Our risk assessment approach operates across three tiers of progressively deeper scrutiny:

- **Tier 1**
Category-level risk classification: All 3,747 suppliers are classified using the ACAN taxonomy, which assigns inherent risk ratings based on industry, geography and product type. This provides a baseline risk view across the entire supply chain.
- **Tier 2**
Supplier self-assessment (ACAN Survey & Sedex SAQ): Suppliers in medium- and high-risk categories are invited to complete detailed self-assessment questionnaires covering labour practices, subcontracting arrangements, worker welfare and management systems. 929 cumulative ACAN surveys and 142 Sedex SAQs have been completed.
- **Tier 3**
Social audits and site-level verification: For suppliers identified as highest-risk through self-assessment, social audits (including SMETA and equivalent standards) are reviewed through the Sedex platform. 11 social audits were visible in 2025 with 66 audit findings identified.

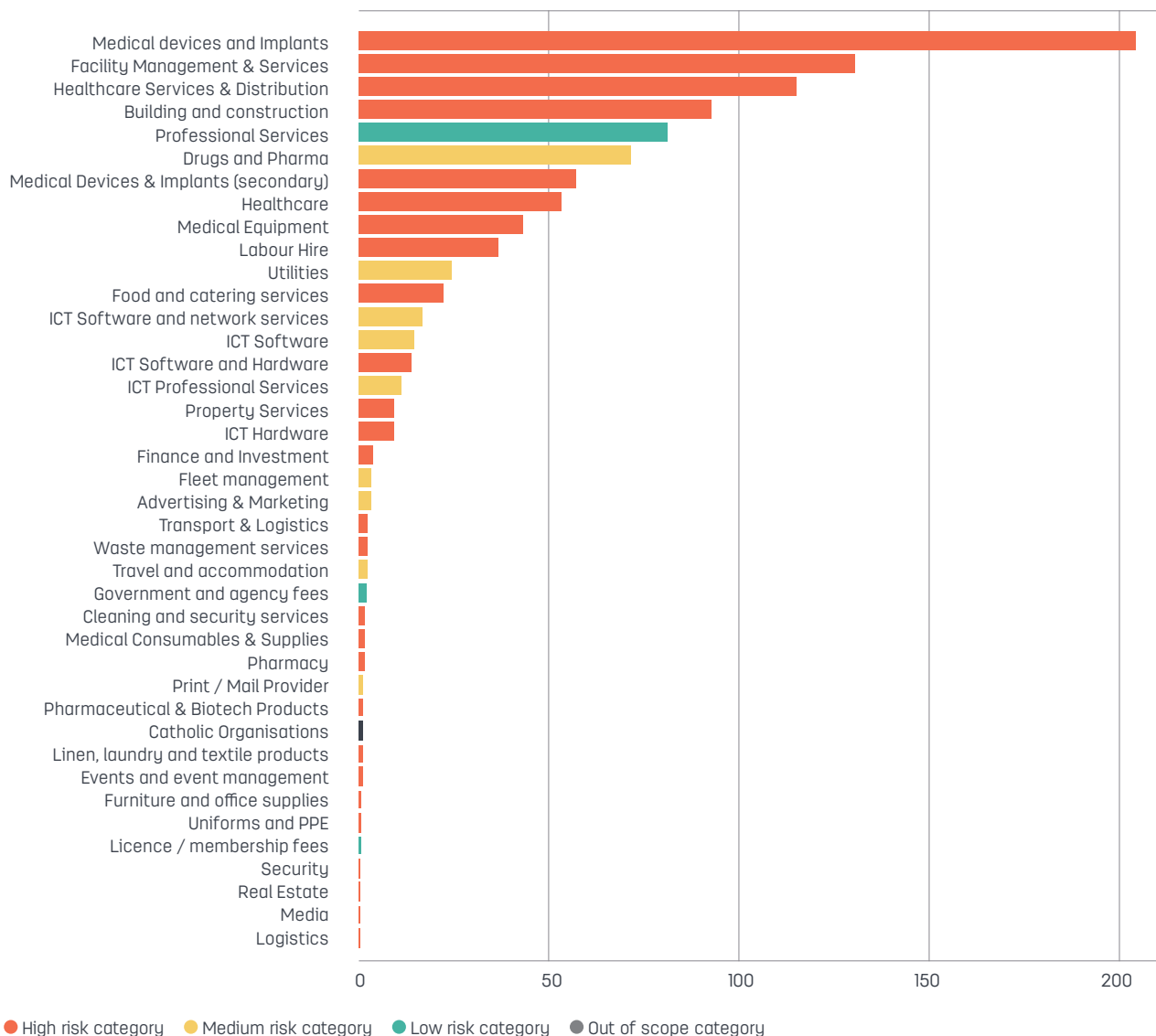
Industry Sector Risk

Certain industries have an inherently higher risk of modern slavery due to labour-intensive production, weak labour regulations and reliance on low-skilled or vulnerable workers. High-risk sectors relevant to St John of God Health Care include:

- Healthcare and medical supply chains (e.g., gloves, PPE, pharmaceuticals)
- Construction and building materials
- Cleaning and facility management services
- Textiles and uniforms
- Electronics and IT hardware
- Food and catering services

The total spend (~\$1.039 billion) and supplier risk across 3,747 suppliers was assessed in 2025 using the ACAN taxonomy across 40 supply categories. The graph below shows the outcome of the 2025 risk classification.

Modern Slavery Risk by Spend Category (40-Category Breakdown)



Commodity/Product Risk

Some products and raw materials are more susceptible to modern slavery due to sourcing practices and labour exploitation. High-risk products include:

- Medical gloves and PPE (sourced from high-risk labour regions)
- Surgical instruments and medical devices (metals and components from high-risk regions)
- Uniforms and textiles (cotton from countries with forced labour issues)
- Electronics and IT (computers, servers, smartphones — linked to forced labour in mining for raw materials)
- Rubber, palm oil, seafood and cocoa (commonly associated with forced or child labour)

Geographic Location Risk

The country of origin of a supplier or product is a major determinant of modern slavery risk. Key risk factors include weak labour laws and enforcement, prevalence of forced labour and child labour, and lack of corporate transparency. High-risk regions include:

- Asia-Pacific (e.g., China, Malaysia, Bangladesh, India, Thailand, Myanmar)
- Middle East and Africa (e.g., UAE, Qatar, Democratic Republic of the Congo)
- Latin America (e.g., Brazil, Mexico, Peru)

Workforce Profile Risk

St John of God Health Care recognises social, economic and cultural aspects that could increase a worker's vulnerability, including but not exclusive to:

- Dangerous and hazardous work, isolation (work completed out of standard office hours with little or no supervision)
- Sham contracting, undeclared contracting and subcontracting arrangements (lack of clarity on layers between principal employer and workers)
- Insecure work (high levels of casual and zero-hours contracts with low coverage of sick leave)
- Workers with English as a second language (low awareness of entitlements and rights, including students on visas and migrant workers)
- Labour-intensive work (quotas and work demand often too high for the allocation of time and number of people)

Recruitment and Labour Hire Risk

Modern slavery risks increase when recruitment practices are opaque or exploitative. Key risk factors include:

- Charging of recruitment fees (leading to debt bondage)
- Unclear contracts and lack of employment documentation
- Retention of passports or work permits by employers
- Restrictions on worker movement or freedom

Supply Chain Complexity Risk

Modern slavery risks increase with greater supply chain complexity and lack of transparency. Key risk indicators include:

- Use of multiple subcontractors (higher risk of illegal subcontracting)
- Lack of traceability in supplier tiers (beyond Tier 1 suppliers)
- Limited supplier due diligence and reporting mechanisms

Supplier Due Diligence and Compliance Risk

The effectiveness of supplier governance and compliance directly affects modern slavery risks. Key risk indicators include:

- No supplier code of conduct addressing modern slavery
- No independent social audits or third-party certifications
- Failure to remediate identified labour rights issues
- Lack of worker grievance mechanisms

Operational Risk Factors

We recognise that modern slavery risks are not limited to supply chains. The following operational risk factors are considered in our assessment:

- **Labour hire and agency workers**
Use of third-party labour providers, particularly in cleaning, catering, security and maintenance, creates risks of exploitation including underpayment, excessive working hours and restrictions on freedom of movement.

- **Migrant and temporary visa workers**

Workers on temporary visas may face heightened vulnerability due to language barriers, limited awareness of workplace rights and dependency on employer-sponsored arrangements.

- **Subcontracting chains**

Multi-tier subcontracting in construction, maintenance and facility management can obscure visibility of labour conditions at lower tiers.

- **Geographic origin of goods**

A significant proportion of medical devices, ICT equipment, textiles and PPE are manufactured in countries with elevated modern slavery risk indicators, including parts of Asia and the Pacific region.

- **Seasonal and casual labour**

Casual and seasonal workforce arrangements in catering and hospitality services may involve workers in precarious employment situations.

Sedex Risk Breakdown

Of the 142 suppliers with completed SAQs on the Sedex platform, the risk distribution is as follows:

- **High risk: 40 suppliers (28.17%)**

These suppliers are prioritised for enhanced due diligence, corrective action follow-up and social audit review.

- **Medium risk: 44 suppliers (30.98%)**

These suppliers are monitored through periodic review and targeted engagement.

- **Low risk: 58 suppliers (40.85%)**

These suppliers have demonstrated satisfactory labour practices and management systems.

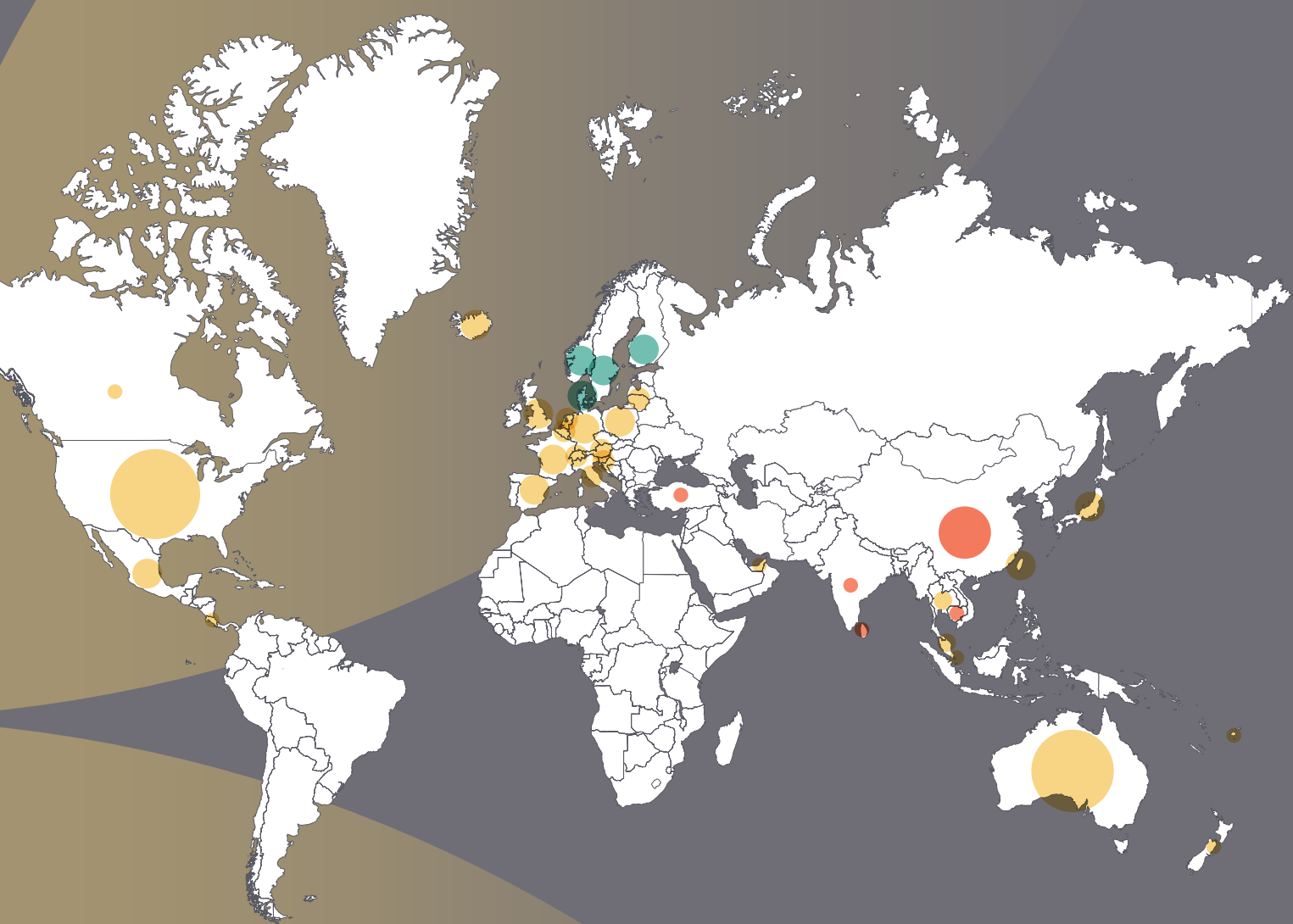
Donations to St John of God Foundation

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

A documented procedure outlines governance for the acceptance, recording and acknowledgement of gifts. In addition, the procedure outlines responsibilities if unethical or socially irresponsible behaviour is suspected, and specifically references modern slavery as an example of unacceptable behaviour.

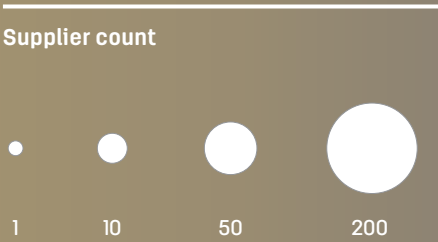
We undertake due diligence on all gifts valued at \$10,000 or more.





Global Supply Chain Risk Map

Tier 1 Supplier Sourcing Countries —
2025 ACAN Entity Report



35

Sourcing
Countries

585

Tier 1
Suppliers

5

High-Risk
Countries

4

Low-Risk
Countries

Risk category



High Risk (5 countries)

China	40
Sri Lanka	3
Cambodia	1
India	1
Turkey	1



Medium Risk (26 countries)

Australia	213
United States	118
Germany	53
United Kingdom	20
Italy	16
France	13
Taiwan	13
New Zealand	10
Switzerland	10
Austria	8
Japan	8
Spain	7
Malaysia	4
Mexico	4
Fiji	3
Lithuania	3
Thailand	3
Belgium	1
Canada	1
Costa Rica	1
Iceland	1
Netherlands	1
Poland	1
Singapore	1
Slovakia	1
United Arab Emirates	1



Low Risk (4 countries)

Denmark	17
Sweden	4
Finland	2
Norway	1





Actions Taken during 2025

Mandatory Criteria 4 — Describe the actions taken to assess and address risks

Our actions during 2025 are organised against the six pillars of our modern slavery approach. These actions address both supply chain risks and operational risks and reflect our commitment to moving beyond compliance toward demonstrable impact.

Six Strategic Pillars

Pillar 1

Governance & Accountability



Pillar 2

Risk Assessment & Supply Chain Visibility



Pillar 3

Supplier Engagement & Due Diligence



Pillar 4

Remediation & Worker Protection



Pillar 5

Capability, Training & Ethical Culture



Pillar 6

Reporting, Transparency & Improvement



Modern Slavery Working Group

St John of God Health Care maintains a dedicated Modern Slavery Working Group, comprising 11 representatives from key functional areas, including procurement and supply chain, workforce, legal, international health, corporate affairs, compliance, policy, and risk. This cross-functional collaboration ensures a comprehensive and integrated approach to addressing modern slavery risks across our operations and supply chains.

The group initially convened bimonthly to establish governance structures and drive early-stage initiatives. As the program has matured, the meeting frequency has transitioned to a quarterly schedule to maintain momentum while allowing flexibility. The Working Group reports to the Audit & Risk Committee.

Pillar 1 — Governance & Accountability

Governance of modern slavery risk is overseen by the Board Audit & Risk Committee (ARC), with operational coordination through the Modern Slavery Working Group and alignment to the ESG Council.

- Ongoing oversight by the Modern Slavery Working Group and Board Audit & Risk Committee.
- Integration of modern slavery reporting within ESG governance structures.
- Finalisation of the Modern Slavery and Ethical Supply Chain Framework & Roadmap 2026–2030, which will be tabled for Board endorsement in May 2026.

- Establishment of clear accountability lines across procurement, risk and compliance, people and culture, and executive leadership.
- Maintained standardised, regular reporting to the ARC, providing detailed insights into expenditure, risk assessments and contract management by supplier and category.
- Monitored grievance and whistleblowing platforms, ensuring concerns raised by internal or external parties were addressed promptly.

Pillar 2 — Risk Assessment & Supply Chain Visibility

- 929 cumulative ACAN Supplier Surveys completed (377 completed in 2025).
- 170 suppliers identified for Sedex onboarding (up from 159 invited in 2024).
- 142 suppliers on Sedex with SAQs completed (40 High, 58 Low, 44 Medium risk).
- 11 social audits visible through Sedex (66 audit findings identified).
- Continued refinement of category-level risk classification using the ACAN taxonomy across 14 supply chain categories.
- Reclassified assessment taxonomy to align with ACAN recommendations, now covering 40 spend categories for better risk assessment and monitoring.

Pillar 3 — Supplier Engagement & Due Diligence

Supplier engagement operates through a tiered model, with intensity of engagement calibrated to risk level:

- 66 corrective actions identified through audit findings (down from 81 in 2024, reflecting targeted focus on higher-risk suppliers).
- 22 supplier staff completed ACAN modern slavery e-learning.
- 2,657 supplier emails sent as part of engagement communications.
- 8,468 supplier communications issued across the reporting period.
- Modern slavery clauses continue to be integrated into new and renewed supplier contracts. As at 2025, 348 contracts included modern slavery clauses across 500+ active contracts. Work is underway to expand coverage to all applicable contracts through renewal cycles.
- St John of God Health Care's Supplier Code of Conduct sets expectations for labour standards, subcontracting transparency and worker welfare across our supply base.
- Extended ethical sourcing guidelines to suppliers under blanket purchase order agreements, encompassing significant non-payroll expenditure.

Case Study

Supplier Risk Reviews

In 2025, joint Supplier Risk Reviews were undertaken to enhance supplier engagement and management of modern slavery risk. The model introduced a clear review layer between supplier self-assessment and action planning to make supplier responses robust, risk-based, and outcome-driven on enhancing worker protection.

The Supplier Risk Reviews identified:

- Inconsistent reporting on the use of indirect labour — with undertakings to clarify labour hire practices and put in place appropriate protections for workers.
- Determination of high-risk product and service categories — with suppliers being requested to outline risk reduction measures and make inclusion of workers' rights contractual.
- Gaps in governance and public disclosures — with suppliers being requested to update documentation to include current anti-modern-slavery requirements.
- While grievance mechanisms were in place, their effectiveness was in doubt, leading to calls for improved metrics and access.
- Inconsistencies in remediation procedures were addressed through dialogue, leading to commitments to develop or update frameworks.
- Key Metrics: 21 Supplier Risk Reviews scoped, 7 completed, 5 supplier meetings completed, 20 additional historical assessments shared with the Hospitals Working Group.

21

Supplier Risk Reviews scoped

7

completed

5

supplier meetings completed

20

additional historical assessments shared with the Hospitals Working Group

Partnerships and Collaboration

St John of God Health Care continued to actively engage with external partners and sector bodies to strengthen our modern slavery response:

- **Australian Catholic Anti-Slavery Network (ACAN)**

St John of God Health Care is a member of ACAN and utilises ACAN's ROTA platform for supplier risk assessment, the Sedex platform for supplier due diligence, and ACAN's annual maturity assessment framework.

- **Catholic Health Australia (CHA)**

St John of God Health Care participates in CHA's modern slavery working group, contributing to sector-wide guidance and shared learning.

- **Catholic Negotiating Alliance (CNA) / CNA JPN**

Engagement enables cross-sector collaboration with Catholic education, social services and aged care organisations.

- **Australian Catholic Religious Against Trafficking in Humans (ACRATH)**

Ongoing partnership to enhance awareness on modern slavery.

- **Catholic Mission**

Expanded partnerships on key initiatives.

- **International Day for the Abolition of Slavery**

Public commitment and awareness campaigns conducted during the reporting period.

Contract Management

We executed new contracts and variations to existing contracts, including anti-slavery clauses for 348 of our suppliers across 500+ active contracts. We continue to

include anti-slavery provisions in new contracts through sourcing events and contract variations. We continued to review our templates to ensure compliance with modern slavery provisions.

Code of Conduct

In 2025, St John of God Health Care maintained its enhanced Code of Conduct, reinforcing the expectation that caregivers, suppliers and stakeholders uphold the highest standards of integrity, ethical behaviour and compliance with modern slavery prevention measures.

The Code of Conduct is reviewed regularly and is available on both internal and external platforms, ensuring transparency and accessibility. It outlines the minimum standards and behaviours required of all caregivers, promoting fairness, respect and ethical decision making while aligning with our Mission, Vision and Values.

St John of God Health Care maintains a zero-tolerance approach to all forms of exploitation, abuse and unethical labour practices. This principle is embedded across our operations and forms a cornerstone of our ethical commitment.

Modern Slavery Policy

As part of St John of God Health Care's commitment to combating modern slavery, an annual review of the Modern Slavery Policy was completed. This review ensures that the policy remains aligned with evolving regulatory requirements, industry best practices and organisational priorities. The Modern Slavery Policy consists of a comprehensive framework that includes:

- **Policy**

Outlining St John of God Health Care's commitment to eradicating modern slavery, ethical sourcing expectations, and compliance with relevant laws and regulations.

- **Procedures**

Providing clear guidance on risk assessment, due diligence and reporting mechanisms.

Pillar 4 — Remediation & Worker Protection

Remediation and worker protection are central to our modern slavery response. During 2025, we progressed the development of formal remediation protocols aligned with the UNGPs and the 2026–2030 Framework.

- No substantiated modern slavery incidents were identified during 2025.
- Development of a victim-centred remediation protocol aligned with the 2026–2030 Framework, to be formalised during 2026.
- St John of God Health Care's existing whistleblower framework (under the Whistleblower Policy) provides confidential channels for reporting suspected modern slavery or labour exploitation, available to caregivers, contractors and suppliers.
- Grievance mechanisms for workers in contracted supply chains will be strengthened under the Framework through integration with the Domus 8.7 incident management system, planned for implementation during 2026–2027.

Pillar 5 — Capability, Training & Ethical Culture

Training and capability building supports early identification and escalation of modern slavery risks across the organisation.

- 93 caregivers completed modern slavery training in 2025, maintaining the training rate achieved in 2024.
- 22 supplier staff completed ACAN modern slavery e-learning (down from 120 in 2024 — noting the 2024 figure included a one-off onboarding cohort).
- Five Modern Slavery eLearning modules are available for caregivers on the Learning and Development platform.
- For new members joining the Modern Slavery Working Group, essential training modules including Modern Slavery 101, Business Readiness, and Grievance Mechanisms and Remedy were completed.
- Training content covers indicators of modern slavery and forced labour, reporting obligations under the Act, St John of God Health Care escalation pathways, and supply chain due diligence expectations.
- Modern slavery awareness is planned for integration into caregiver onboarding and procurement role-specific training under the 2026–2030 Framework.

Vendor Onboarding

As part of our transition to a new Enterprise Resource Planning (ERP) system, we revisited and refined our vendor onboarding process to strengthen compliance, risk management and transparency in supplier engagement.

The onboarding process now links to the St John of God Health Care Supplier Code of Conduct and our standard terms and conditions, reinforcing our commitment to ethical sourcing. Modern slavery commitments form an integral part of the supplier onboarding process, ensuring all new suppliers acknowledge and comply with our modern slavery commitments as a required condition of onboarding.

Pillar 6 — Reporting, Transparency & Improvement

- Strengthened data ownership and reporting clarity in preparation for independent assessment.
- ACAN will conduct an independent assessment of our modern slavery maturity following the completion of the 2025 reporting cycle.
- Continued alignment of modern slavery reporting with ESG disclosure requirements, including GRI 408 (Child Labour) and GRI 409 (Forced or Compulsory Labour).
- Enhanced data collection processes to support outcome-based indicators alongside input metrics in future reporting periods.







Effectiveness Assessment

Mandatory Criteria 5 — Describe how the entity assesses the effectiveness of actions

At St John of God Health Care, we continuously strengthen our governance, risk management and due diligence processes to mitigate modern slavery risks.

Our Board Audit and Risk Committee (ARC) plays a key role in reviewing identified risks, ensuring compliance and overseeing mitigation measures across our operations and supply chain.

We measure the effectiveness of our actions through a combination of governance oversight, supplier coverage metrics, contractual compliance, training completion rates and remediation pathway development.

The table below provides a year-on-year comparison of key performance indicators:

Year-on-Year Analysis

Several metrics demonstrate continued progress in 2025. The cumulative ACAN Supplier Survey count increased from 552 to 929, reflecting sustained engagement across the supply base. Sedex onboarding continued to grow, with 142 suppliers now maintaining completed SAQs (up from 122 in 2024).

Some metrics showed decreases compared to 2024. Social audits visible through Sedex declined from 18 to 11, reflecting the audit cycle timing and the focus on suppliers undergoing re-assessment. Supplier e-learning completions fell from 120 to 22; the 2024 figure included a one-off onboarding cohort for newly enrolled suppliers.

The reduction in total supplier count from 3,918 to 3,747 reflects data cleansing and consolidation of the supplier register, not a reduction in supply chain activity.

Year-on-Year Performance Comparison

Metric	2023	2024	2025
Total suppliers assessed	~3,500	3,918	3,747
ACAN Supplier Surveys completed (cumulative)	~400	552	929
Surveys completed in reporting year	—	638	377
Suppliers identified for Sedex	~100	159 invited	170
Suppliers on Sedex (SAQ completed)	~80	122	142
Social audits visible	12	18	11
Audit findings / corrective actions	~50	81	66
Supplier e-learning completed	—	120	22
Caregiver training	—	93	93
Modern slavery contracts integrated	200+	298	348

Maturity Scorecard — Sedex SAQ (2025)

The Sedex Self-Assessment Questionnaire (SAQ) is a recognised ethical trade assessment tool that evaluates an organisation's policies, processes, and practices relating to labour standards, human rights, governance, and business ethics. Each thematic area is scored based on the level of policy maturity, implementation, and supporting evidence, with points awarded against defined criteria aligned to international standards such as the ILO conventions and the UN Guiding Principles on Business and Human Rights. The total points achieved are expressed as a percentage and translated into maturity ratings (e.g., Good or Advanced), enabling

organisations to benchmark performance and identify areas for improvement over time.

St John of God Health Care has maintained an overall maturity rating of 50% (Established), with positive movement in Worker Engagement (+3.76%) and Operations (+2%), offset by decreases in Supply Chain (-7.74%) and Entity Program & Activities (-8%). Risk assessment ratings remained largely maintained across pillars.

Overall maintained our maturity at ~50% as a Sustained Practice with maturity ambition of a Maturing practice over the next 5 years to reach a target maturity of 65%.

Sedex SAQ Maturity Assessment (2025)

Pillar	A	B	C	D	2025	Risk Assessment (SEDEX)
1 Business Process & Governance						Maintained
2 Operations						2%
3 Supply Chain						Maintained
4 Worker Engagement						Maintained
5 Entity Program & Activities						Additional Measures (-8%)
6 Grievance & Remediation						Maintained
Maturity Overall Improvement	0.78%	-2.76%	-7.74%	3.76%	-1.92%	-1.58%

Established Partial Emerging — moon-phase indicators of maturity per pillar.

Remediation & Grievance Mechanisms

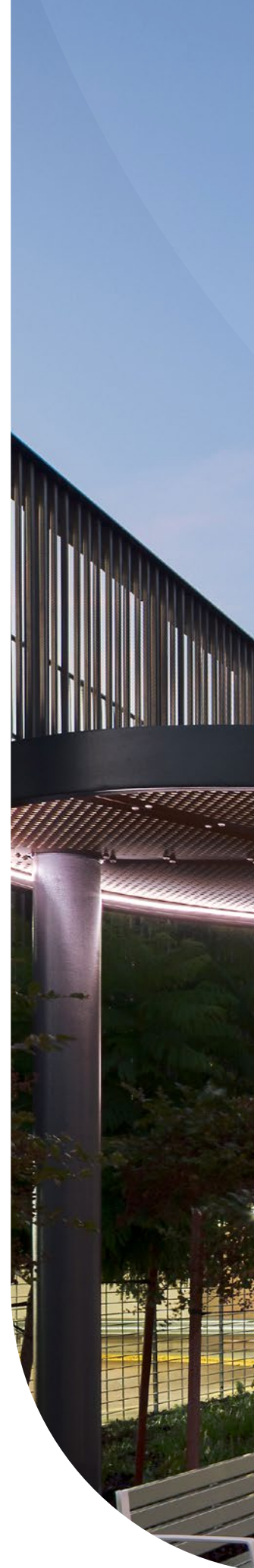
St John of God Health Care provides several avenues for individuals to raise grievances or provide feedback, both internally and externally focused. These include existing internal complaint and feedback channels, whistleblower protections, and established referral pathways through ACAN and partner organisations such as ACRATH. St John of God Health Care is committed to ensuring these mechanisms are accessible, safe and responsive to the needs of affected individuals.

- Existing grievance and feedback channels are available to caregivers, contractors and external stakeholders to raise concerns related to modern slavery or unethical practices.
- Referral pathways to specialist support services, including ACRATH, are maintained to provide guidance and assistance where modern slavery concerns are identified.
- St John of God Health Care is reviewing additional remediation mechanisms, including Domus 8.7 — a modern slavery remediation service available through the ACAN Program — to determine its suitability for integration into St John of God Health Care's remediation framework in future reporting periods.

Forward Indicators

To strengthen effectiveness measurement in future periods, we are developing the following forward indicators as part of the 2026–2030 Framework:

- **Corrective action closure rate**
Measuring the proportion of audit findings remediated within agreed timeframes.
- **Supplier risk rating improvement**
Tracking movement of suppliers from higher to lower risk categories following engagement.
- **Worker-voice indicators**
Exploring worker feedback mechanisms, including Domus 8.7, as part of St John of God Health Care's review of additional remediation and engagement tools for future reporting periods.
- **Independent assurance**
External verification of risk assessment and remediation processes in collaboration with ACAN, targeted for 2029.





St John of God Subiaco Hospital



Consultation

Mandatory Criteria 6 — Describe the process of consultation with owned or controlled entities

St John of God Health Care undertook consultation with each of its owned and controlled entities during 2025 to inform the preparation of this joint statement. The consultation process was designed to ensure that the modern slavery risks, actions and outcomes relevant to each entity were appropriately captured.

Consultation with Controlled Entities

St John of God Health Care consulted with each of its owned and controlled entities through existing governance and management channels. The consultation process confirmed each entity's modern slavery risk exposure, reviewed relevant supply chain and workforce arrangements, and informed the content of this joint statement.

The following controlled entities were consulted as part of this reporting period:

- St John of God Outreach Services
- St John of God Foundation Inc
- St John of God Midland Health Campus Ltd
- Dencross Pty Ltd
- St John of God Berwick Health Campus Ltd
- St John of God Marillac

Internal Cross-Functional Consultation

Internal consultation was conducted across key business functions to inform the content of this statement and the development of the 2026–2030 Framework:

- **Procurement & Supply Chain**
Led supplier risk assessment, category analysis and supplier engagement activities.
- **Risk & Compliance**
Contributed to risk methodology, regulatory alignment and governance reporting.
- **People & Culture**
Provided workforce data, training metrics and labour hire oversight.
- **Legal**
Reviewed contractual integration of modern slavery clauses.

- **Executive Leadership Team**
Endorsed the Framework and provided strategic direction on resourcing and priorities.
- **Members of the Modern Slavery Working Group**
Coordinated cross-functional input and reported progress to the Audit & Risk Committee.

External Consultation

St John of God Health Care continues to actively engage with external partners and sector bodies to strengthen our modern slavery response:

- **Australian Catholic Anti-Slavery Network (ACAN)**
St John of God Health Care is a member of ACAN and utilises ACAN's ROTA platform for supplier risk assessment, the Sedex platform for supplier due diligence, and ACAN's annual maturity assessment framework.



ACAN provides sector intelligence, compliance support and access to the Domus 8.7 grievance management system.

- **Catholic Health Australia (CHA)**
St John of God Health Care participates in CHA's modern slavery working group, contributing to sector-wide guidance and shared learning on supply chain due diligence practices.
- **Catholic Negotiating Alliance (CNA)**
Engagement through CNA enables cross-sector collaboration with Catholic education, social services and aged care organisations on modern slavery prevention.
- **Anti-Slavery Commissioner**
St John of God Health Care monitors guidance and publications from the Australian Anti-Slavery Commissioner to inform our approach and ensure alignment with regulatory expectations.

Framework & Roadmap Endorsement Process

In addition to consulting on the annual statement, St John of God Health Care undertook specific consultation with its Executive Leadership Team and Board regarding the Modern Slavery and Ethical Supply Chain Framework & Roadmap 2026–2030. This included:

- Presentation of the Framework to the Executive Leadership Team in February 2026, including endorsement of the Framework & Roadmap.
- Preparation of an Assurance Memorandum for the Audit & Risk Committee, providing detailed analysis of programme maturity, KPI performance, and the strategic rationale for the Framework & Roadmap.



Other Relevant Information

Mandatory Criteria 7 — Any other relevant information

In addition to the actions described above, St John of God Health Care undertook the following initiatives during 2025 to support our modern slavery prevention efforts:

Public Commitment and Awareness

St John of God Health Care publicly recognised the International Day for the Abolition of Slavery (2 December), conducting internal awareness campaigns across all facilities to reinforce our commitment to combating modern slavery.

Stakeholder Engagement

- Participated in stakeholder engagement events with Catholic sector peers.
- Engaged with survivor advocates to inform our understanding of victim-centred approaches to remediation.
- Contributed to the ACAN Compendium, sharing our experiences and approaches with other Catholic health care entities.

Advocacy for Policy Change

St John of God Health Care supports the strengthening of Australia's legislative framework to address modern slavery and welcomes ongoing reform efforts to enhance transparency, accountability, and enforcement.

Framework Enablement

The Framework is enabled by St John of God Health Care's continued membership of ACAN, which provides specialist systems (ROTA, Sedex, Domus 8.7), sector intelligence, and compliance support — enabling access to specialist capability, systems, and sector intelligence through ACAN membership, complementing internal governance structures.

Statutory Reform Readiness

St John of God Health Care is monitoring the Australian Government's response to the statutory review of the Modern Slavery Act 2018, including potential amendments relating to:

- Establishment of an Anti-Slavery Commissioner with investigative and enforcement powers.
- Introduction of penalties for non-compliance, including civil penalties for failure to report or provision of misleading information.
- Mandatory due diligence requirements that may extend obligations beyond reporting to proactive risk identification and remediation.



Future Commitments — 2026–2030 Roadmap

In February 2026, St John of God Health Care finalised its Modern Slavery and Ethical Supply Chain Framework & Roadmap 2026–2030.

The Framework prioritises foundational governance, Tier 1 risk assessment, core training, and compliant reporting — ensuring statutory compliance and progressive maturity improvement, targeting 65% maturity by 2030.

The Framework will be tabled for Board endorsement in May 2026 and establishes the following phased approach:

