

MODERN SLAVERY STATEMENT

2022

Reporting Period 1 January 2022 – 31 December 2022

Catholic Healthcare Limited
ABN 69 064 946 318



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ABOUT US

Catholic Healthcare is a trusted, leading not-for-profit provider of residential aged care, home care and retirement living reaching across the east coast of Australia. We have a strong and proud history of providing care and support to people of all faiths, backgrounds and ethnicities, for 28 years. We are passionate about enriching our client's lives and offer services to nurture the body, mind and spirit. Our person-centred holistic approach focuses on client wellbeing with a continuum of care that is tailored, flexible and covers every stage of life's journey.

Today, Catholic Healthcare operates 43 residential aged care homes, 12 retirement living communities, and provides home and community services to more than 4000 clients.



BRIEF STATEMENT FROM THE *Board Chair & A/CEO*

Catholic Healthcare is committed to upholding the human dignity of those who work with us, whether directly or indirectly. We also support actions that contribute towards a more compassionate and humane society, and this includes supporting Australia's Modern Slavery Laws.

There is no place for modern slavery within our organisation and we are committed to use all reasonable means at our disposal to ensure we do not participate in modern slavery activities.

Our work is particularly focused on the care and support of seniors through our Residential Aged Care Homes, Retirement Living Communities and Community Services.

As part of our work, Catholic Healthcare engages with a diverse range of suppliers of goods and services, with whom we seek to raise awareness of the risk of modern slavery and ensure our supply chains are comprised of credible providers. Catholic Healthcare continues to educate employees on the issue of modern slavery, and we progressively refine our procurement practises with a focus on the ethical production and supply of goods and services.

We are proud to present Catholic Healthcare's third Modern Slavery Statement and commend the officers of our organisation who have embraced the cause of eradicating modern slavery with such zeal despite the challenges presented by COVID-19.

Stephen Teulan
Chair

Josh McFarlane
Acting Chief Executive Officer

2022 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

Achievements

Highlights include:

- The Board and Leadership team completed Modern Slavery training
- Modern Slavery Policy completed and published on the Catholic Healthcare website
- Contract agreements updated with Modern Slavery clauses.
- Supplier Code of Conduct published on the Catholic Healthcare website and included as a link in agreements
- Internal Procurement Policy updated with Modern Slavery requirements.

Catholic Healthcare has continued to make progress in addressing modern slavery risks within our operations during the 2022 reporting period. Our taskforce, comprising members from across our organisation including Procurement Services, Legal, Mission and the Executive has continued to roll out educational initiatives relating to modern slavery. We have made further modern slavery improvements to organisational policy and procedure. This work has taken place against the backdrop of the continuing COVID-19 pandemic which has placed great stress on aged care organisations and has also highlighted new risks within our operations to which we have responded to ensure those we care for, and employ, are protected.

Our Plans for 2023 and Beyond

In 2023 and beyond, Catholic Healthcare intends to continue to extend modern slavery training throughout the organisation, strengthen our policies and procedures, and promote further supplier involvement in anti-modern slavery actions. Further details are set out in this Statement. We also intend to expand our taskforce to Human Resources, Property, and Information Technology service areas.

Criterion 1 -

ORGANISATIONAL STRUCTURE

Catholic Healthcare’s Mission is that we promote the dignity, life, and spirituality of older people through connected and inclusive communities.

We are guided by our values of courage, compassion and integrity.

As a trusted leading not-for-profit entity, we have a strong and proud history of providing residential aged care, home care, retirement living and healthcare across New South Wales and South-East Queensland. Catholic Healthcare has been operating for more than 28 years and provides care and support to people from all faiths, backgrounds and ethnicities.

Catholic Healthcare was founded in 1994 by the Bishops of the Province of Sydney at the request of six Founding Members: Sisters of Charity, Sisters of St Joseph (NSW Province), Sisters of Mercy (Singleton), Little Company of Mary, Sisters of St John of God and Brothers of St John of God.

Guided by our Members and Trustees, Catholic Healthcare has a single operating entity, Catholic Healthcare Limited. Catholic Healthcare Limited operates as an integrated provider of aged care services through two (2) divisions:

Operations	<ul style="list-style-type: none"> • Residential aged care homes • Retirement living communities • Social housing for seniors • Home Care packages • Commonwealth Home Support services • Homelessness services • Hoarding and squalor services • Assessment services for seniors
Corporate Services	<ul style="list-style-type: none"> • Mission • Human Resources • Information Technology • Finance • Property • Strategy and Marketing • Clinical Governance and Safe Care • Risk and Project Management Office • Legal • Company Secretariat • CEO’s Office

Criterion 2 -

OPERATIONS AND SUPPLY CHAIN

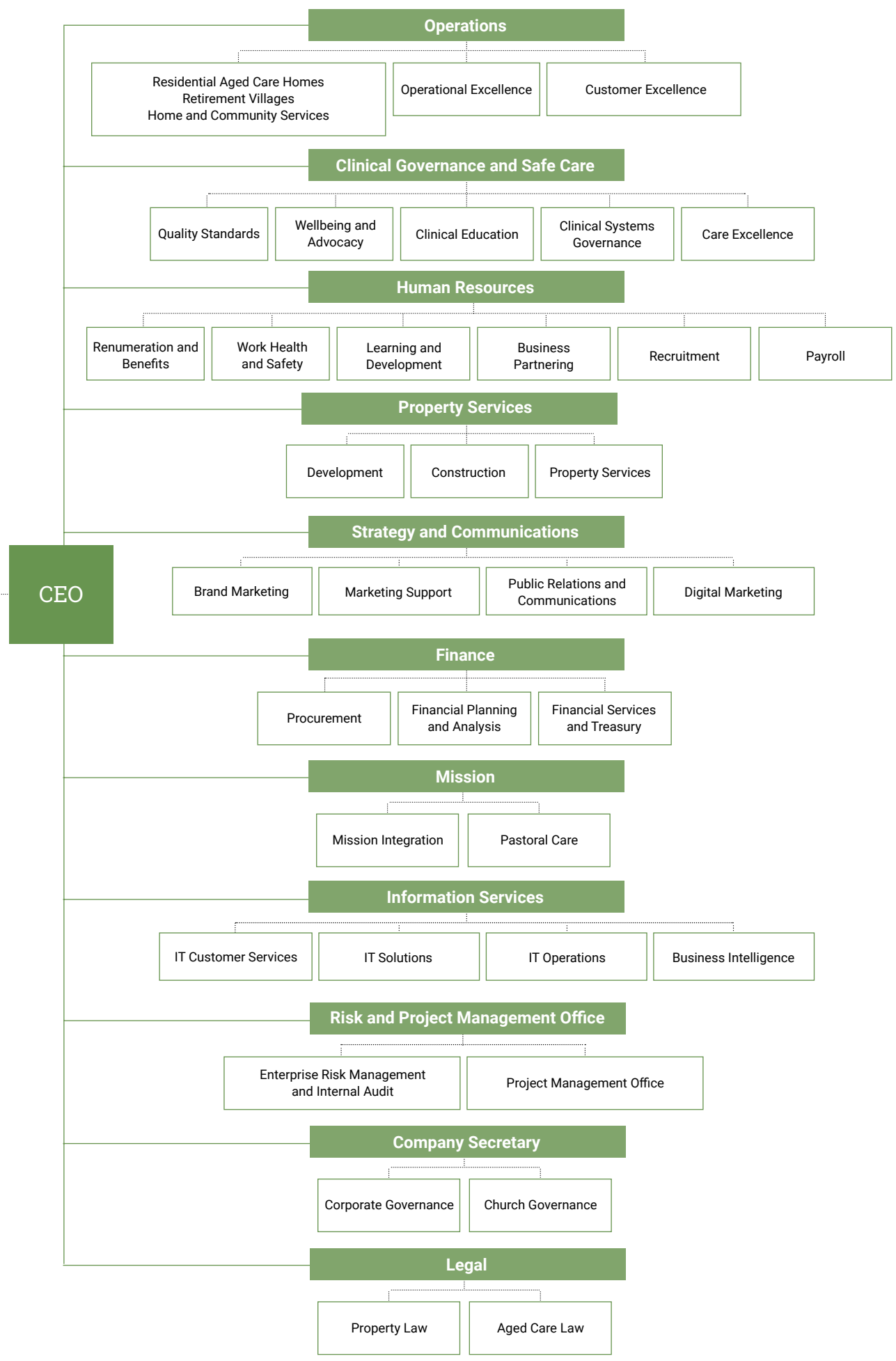
Suite 1, Level 5, 15 Talavera Road Macquarie Park, NSW 2113

AT A GLANCE



CATHOLIC HEALTHCARE LIMITED (CHL) ORGANISATIONAL CHART

Catholic Healthcare Limited Board



CRITERION 1
CRITERION 2
CRITERION 3
CRITERION 4
CRITERION 5
CRITERION 6 & 7

Our locations



RESIDENTIAL AGED CARE

- | | |
|---|---|
| 1 Villa Maria Centre
Eastern Heights | 23 Emmaus Village
Kemps Creek |
| 2 Villa Maria
Fortitude Valley | 24 George Mockler House
Mona Vale |
| 3 Coolamon Villa
Mullumbimby | 25 Gertrude Abbott Aged Care
Surry Hills |
| 4 St Francis Aged Care
Grafton | 26 Holy Spirit Aged Care
Revesby |
| 5 St Joseph's Aged Care
Coffs Harbour | 27 Holy Spirit Croydon
Croydon |
| 6 Charles O'neill
Mayfield West | 28 Lewisham Nursing Home
Lewisham |
| 7 St John's Villa
New Lambton | 29 Lewisham Retirement Hostel
Lewisham |
| 8 Our Lady of Loreto Gardens
Hamlyn Terrace | 30 McQuoin Park
Wahroonga |
| 9 Bodington
Wentworth Falls | 31 Percy Miles Villa
Kirrawee |
| 10 St Mary's
Berkeley | 32 The Sister Anne Court
Surry Hills |
| 11 Villa Maria Centre
Unanderra | 33 St Anne's Aged Care
Hunters Hill |
| 12 Maranatha Lodge
Batehaven | 34 St Bede's Home
South Hurstville |
| 13 Blakeney Lodge
Tumut | 35 St James Villa
Matraville |
| 14 The Haven
Wagga Wagga | 36 St Joseph Aged Care
Hunters Hill |
| 15 Macquarie Care Centre
Bathurst | 37 St Paul's
Northbridge |
| 16 St Catherine's
Bathurst | 38 St Peter's
Lane Cove North |
| 17 Jemalong Residential Village
Forbes | 39 Vincentian Aged Care Service
East Sydney |
| 18 St Francis Aged Care
Orange | 40 St Hedwig Village
Blacktown |
| 19 St Mary's Villa
Dubbo | 41 Holy Spirit
Casula |
| 20 Holy Spirit Dubbo
Dubbo | 42 Mackillop House
Norwest |
| 21 Bethlehem House
Kogarah | |
| 22 Brigidine House
Randwick | |

RETIREMENT LIVING

- | | |
|---|---|
| 1 Aquinas Court
Springwood | 7 St Peter's Green
Lane Cove North |
| 2 Bishop McCabe Retirement Village
Towradgi | 8 Charles O'Neill
Mona Vale |
| 3 St Mary's Retirement Living
Berkeley | 9 The Haven
Wagga Wagga |
| 4 The Bailly
Orange | 10 St Hedwig Village
Blacktown |
| 5 Emmaus Retirement Village
Kemps Creek | 11 McQuoin Park Retirement Living
Wahroonga |
| 6 The Brighton
Croydon | 12 Jemalong Residential Village
Forbes |

HOME CARE

You will find us in regional and metro areas across NSW and South East QLD.

Only key locations are shown here, please enquire to find a service near you.



Our Governance Framework

As a Catholic service provider, Catholic Healthcare is concerned with the welfare of all persons, particularly those who are most vulnerable. Our approach to care is informed by the Parable of the Good Samaritan.

Our Trustees and Board, who both have oversight and governance of Catholic Healthcare's Mission, are conscious of the risks of modern slavery infiltrating supply chains and as a result actively encourage management to progress initiatives aimed at identifying and addressing modern slavery risks.

Our Supply Chain

Catholic Healthcare sources a wide range of goods and services to support the delivery of aged care services to our client and residents from more than 2,000 suppliers. These range from sophisticated global service providers to sole traders in the following categories:

- Food and beverages sourced through providers who provide quality products locally or regionally

- Linen and laundry supplies
- Medical and care supplies including medications, incontinence aids, Protective Personal Equipment (PPE) and Rapid Antigen Tests (RATs)
- Property supplies and services ranging from those required for new, and refurbishment of, residential aged care homes and independent living communities and property maintenance services for all existing properties
- Information technology services ranging from system applications for Catholic Healthcare buildings, telephone and mobile devices and computer equipment
- Marketing and communications services including printing and publications and website design
- Workforce supplies including employees, consultants and agency workforce. This includes a small number of workers on visas.

Some suppliers, themselves, source goods that are on-sold to Catholic Healthcare. Some of these goods may be sourced from foreign countries.

Criterion 3 -

MODERN SLAVERY RISKS

Catholic Healthcare understands that some goods (including their component parts) may have been impacted by modern slavery practices. As explained in our 2021 Modern Slavery Act Statement, to better understand these risks, we undertook a comprehensive analysis of the top 50 suppliers by spend in our organisation, to determine which and how many of our top suppliers can be categorised as 'high risk'.

To expand upon this analysis, in 2022, we maintained our membership with the Australian Catholic Anti-Slavery Network (ACAN) to support us in eradicating Modern Slavery practises from our organisation. Our 2022 analysis of Modern Slavery risks has relied upon reporting from the ACAN Risk Management Program. Drawing on data from 36 ACAN entities, the report provides a statistical overview of Modern Slavery risks according to industry and reviews the risks through a category lens. This risk assessment has guided Catholic Healthcare's approach, and the actions taken to minimise Modern Slavery practises, in 2022.

Operational Risks

Our People

Catholic Healthcare employs more than 4000 individuals including full time, part time and casual workers. Around 83% of our workforce identify as female which is recognised to be common among the caring professions. Although we do not regularly collect data on the country of origin of our employees, it is known that we employ a diverse workforce with employees coming from many nationalities

including Australian, European, Asian, North and South American and African continents.

Due to industry wide challenges including the impact of COVID-19, there has also been great difficulty sourcing employees and contracted personnel and the fact that we employ such a diverse workforce may unintentionally impact vulnerable workers.

Catholic Healthcare recognises that labour hire is a high-risk category in our supply chain but is nonetheless necessary for our operations. Most of our care workforce is employed under Enterprise Agreements approved by the Fair Work Commission, making the risk of modern slavery in our directly employed workforce low. A smaller percentage of workers in our corporate service's divisions and head office are employed under individual contracts of employment. Agency workers, when required, such as Registered Nurse (RN), Enrolled Nurse (EN), Assistants in Nursing (AIN) and Care workers, are engaged under agency agreements with external suppliers. Other service providers including allied health professionals and hairdressers are engaged under individual contractor arrangements that allows for negotiation.

The use of employment agencies and labour hire contractors to procure agency workers represents a modern slavery risk category and to address this we have updated our standard agency contracts to include robust anti-slavery clauses, which ensures contractors comply with our Modern Slavery Policy and allows Catholic Healthcare to terminate agreements if

they engage in modern slavery or do not comply with Catholic Healthcare policy. To date, no contractors have raised any issues with these new standard clauses and Catholic Healthcare has not been made aware of any breaches to its contract terms in relation to modern slavery.

Supplier Risks

In 2022 we reviewed the original risk assessment and concluded that it is still valid. The original risk assessment mapped the potential for modern slavery practises across our top 50 suppliers by spend so as to improve our understanding of the key procurement categories that contain high risks of modern slavery.

Catholic Healthcare procures goods and services across 18 broad procurement categories including:

- Building and construction
- Professional services
- Linen and laundry
- Events and entertainment
- Allied health
- Waste management
- Food and beverage
- Utilities
- ICT software and network services
- Labour Hire
- Cleaning Services
- Uniforms and PPE
- Medical supplies
- Facility management and property management
- Travel Services
- ICT hardware
- Furniture and office supplies
- Printing and mail provider.

The list below was developed by ACAN covering a range of organisations and we have identified the following high-risk categories as relevant to our organisation:

- Medical equipment, supplies and consumables
- Building, construction, and fabrication services
- Prothesis, implants and medical devices
- Food, beverage and hospitality
- Property, facility, and maintenance
- Cleaning services
- Labour hire
- Office and teaching supplies, furniture and services
- Waste management
- Clothing, PPE and other personal equipment
- Linen and laundry
- Events, excursions, camps, and entertainment
- Security services.



Criterion 4 -

STEPS TAKEN TO ADDRESS MODERN SLAVERY RISK

Catholic Healthcare has endeavoured to consolidate its policies and procedures concerning modern slavery and to evolve practises that prevent modern slavery in our organisation or supply chains.

Our Procurement Policy now includes requests for modern slavery statements from high-risk suppliers as a part of their proposals. Such requests were also incorporated into all the tenders undertaken during 2022. Tenderers have complied with these requests and submitted modern slavery statements as part of their tenders.





Catholic Healthcare has acted on, and expanded, the research and analysis detailed in our Year One and Two reports. This includes extending our analysis of top spend categories when examining the risk of modern slavery in our supply chains and reviewing the organisational Gap Analysis. Catholic Healthcare has also explored the development of an Ethical Practises Questionnaire for staff and suppliers focused on modern slavery.

The overview of the Gap Analysis for the reporting periods is set out below.

Gap Analysis Report - This indicates the gaps in the organisation

NS- Not Started ■ C- Commenced ■ P-Progressing ■ FI- Fully Implemented ■

	Year 2020				Year 2021				Year 2022			
	NC	C	P	FI	NC	C	P	FI	NC	C	P	FI
Management Systems												
Governance		C				C					P	
Commitment												FI
Business Systems							P				P	
Action												
Monitor / Report	NS				NS						P	

NS- Not Started  C- Commenced  P-Progressing  FI- Fully Implemented 

	Year 2020				Year 2021				Year 2022			
Human Resources & Recruitment	NC	C	P	FI	NC	C	P	FI	NC	C	P	FI
Awareness												
Policies and Systems												
Training												
Labour Hire / Outsourcing												

	Year 2020				Year 2021				Year 2022			
Customers and Stakeholders	NC	C	P	FI	NC	C	P	FI	NC	C	P	FI
Customer Attitude												
Information Provision												
Feedback Mechanisms												
Worker Voice												

	Year 2020				Year 2021				Year 2022			
Procurement and Supply Chain	NC	C	P	FI	NC	C	P	FI	NC	C	P	FI
Policy and Procedures												
Contract Management												
Screening and Traceability												
Supplier Engagement												
Monitoring and Corrective Action												

	Year 2020				Year 2021				Year 2022			
Risk Management	NC	C	P	FI	NC	C	P	FI	NC	C	P	FI
Risk Framework												
Operational Risk												
Identifying External Risks												
Monitoring and Reporting Risk												

Modern slavery action plans have been created as required with our Procurement Team and we are currently writing modern slavery action plans with other departments including Marketing, Property and Human Resources. We are poised to create more action plans in the next year.

Catholic Healthcare has prioritised internal education and establishing the structures and resources needed to support the anti-modern slavery efforts of the organisation to ensure that changes made are monitored for effectiveness. To this end, Catholic Healthcare finalised an organisational Modern Slavery Policy in 2022 - a copy of which is annexed at Appendix A.

After joining ACAN in 2020, Catholic Healthcare made use of its resources including ACAN educational tools, which focus on what modern slavery means to Catholic organisations. Catholic Healthcare has also commenced Modern Slavery Awareness training for those in key roles including senior members of the Modern Slavery Taskforce and in 2022, the Catholic Healthcare Leadership Team. We plan to incorporate education about modern slavery into the onboarding process of new employees.

Although COVID-19 has continued to impact Catholic Healthcare during the 2022 reporting period, we have acted on our commitment outlined in the Year One report to take actions to prevent modern slavery in our organisation as explained above.

Domus 8.7

Catholic Healthcare 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.

Remediation includes taking action to address harm to individuals impacted by modern slavery and to mitigate future risks. Due to the complexity of remediation, specialised resources are required to ensure the best outcomes for individuals affected by modern slavery. To address this, Domus 8.7, a not-for-profit, has been established to provide remediation services and a confidential advisory service to individuals affected by modern slavery.

Domus 8.7 will in future triage cases referred to it by Catholic Healthcare and refer victims to internal or external specialists who can provide support, advice and assistance regarding legal, social, and human rights responses to cases of modern slavery. It will also partner with international organisations to ensure supply chain remedial action and prevention is available.

Through Domus 8.7, Catholic Healthcare aims to help individuals impacted by modern slavery to achieve outcomes that can be reported and used to continuously improve risk management and operational response. Any future grievances related to modern slavery are to be mediated through Domus 8.7, and Catholic Healthcare is committed to working with any entity that caused harm to ensure remediation and prevention of recurrence.

In 2022, Catholic Healthcare did not find any cases of modern slavery in its operations and supply chains. This may change once proper channels to identify victims are established and once suppliers are being examined in greater detail.

Criterion 5 –

EFFECTIVENESS OF STEPS TAKEN UNDER CRITERION 4

Monitoring (tracking) is essential to ensure that policies and procedures are effective and operating. We seek to track our progress in relation to modern anti-slavery action by setting goals for each year. Set out below is a table outlining our goals, and progress made towards them, for the 2022 reporting period:

Planned Completion Year	Action	Status as of 2022 CY
2021	Introduce Modern Slavery (MS) clause to all Procurement Contracts	Completed
2021	Develop Remediation guidelines based on findings/ experiences from Y1	Completed
2022	Develop KPIs for suppliers which correlate with Ethical Sourcing	Ongoing
2022	MS training to Board, Leadership team and high-risk roles	Completed
2022	HR training webinar on the role of HR in MS risk management, reporting obligations and other tools, resources and requirement relevant to HR	Completed
2022	Commence training of high-risk and high-spend suppliers: Design and develop Supplier MS workshops based on supplier group/classification and risk rating –undertaken by ACAN in November and December 2022	Ongoing
2022	Commence process of contacting suppliers and contractors to receive their updated MS policies	Ongoing
2023	Roll out MS training to the next level of Catholic Healthcare Managers concentrating on Property Finance and IT	Ongoing
2023	Onboarding MS training program for new employees to be implemented	Ongoing
2023	Complete Action Plans for other Catholic Healthcare departments including Property and HR	To be commenced
2023	Design, formalise and introduce ethical vendor questionnaires (e.g. ACAN guidelines) or disseminate supplier self-assessment questionnaire (SAQ).	Ongoing



We will continue to use goal setting, and assessment of completion against those goals, as our primary metric when it comes to measuring the success of modern slavery initiatives. We will continue to review and evaluate our performance.

As of 31 December 2022, the following training has been conducted by Catholic Healthcare:

- Modern Slavery 101 Training – attended by 6/6 Procurement employees, Leadership Team and all Board Members
- Modern Slavery Human Resources webinar – attended by senior human resources management
- Modern Slavery Suppliers webinar and survey – attended by 19/85 high-risk suppliers, with a further 35/85 completing the survey.

Criterion 6 –

INTERNAL CONSULTATION

Catholic Healthcare has one current operating entity, Catholic Healthcare Limited. Consultation is as described in this statement, primarily through the mechanism of the Modern Slavery Taskforce referred to on page 4.



Criterion 7 –

ANY OTHER RELEVANT INFORMATION

Planned future actions:

- Update Procurement Policy to incorporate provisions relating to ethical sourcing and human rights
- Provide training on 'ethical sourcing' to Procurement category managers to upgrade sourcing skills (certification as compulsory)
- Update and disseminate a supplier Code of Conduct
- Incorporate Modern Slavery Training ACAN 101 as compulsory for those who carry purchasing activities and add this module to Catholic Healthcare's E-learning platform and/or onboarding process
- Develop and disseminate communications to all the high-risk vendors who do not publish Modern Slavery Statements to inform them of the importance of this practice and advise that this is part of Catholic Healthcare's prequalification assessment for any sourcing suppliers
- Update our supplier preferred lists by reference to their compliance with modern anti-slavery requirements
- Update our supplier evaluation process with minimum ethical sourcing requirements including exploring the development of an ethical practises questionnaire.

COVID-19 related information

In the 2022 reporting period, the COVID-19 pandemic continued into its third year with ongoing challenges for residential aged care and home and community service providers.

High numbers of employees continued to be furloughed in line with Government requirements and maintaining a focus on staffing adequacy remained paramount. Ensuring an adequate supply of Personal Protective Equipment and Rapid Antigen COVID-19 tests was also a very high priority.

To the extent possible, we sourced goods and services from highly credible suppliers and educated ourselves and our employees on the impacts of COVID-19 on more vulnerable workers in the supply chain and the potential modern slavery risks the pandemic posed.



catholichealthcare.com.au