

MODERN SLAVERY STATEMENT

2020/21



Making every day the best it can be

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Disclosure Note

This statement has been made on behalf of Australian Aged Care Partners Holdings Pty Limited (AACPH), ACN 162 265 983, the Parent Entity of the Allity group of companies.

This statement covers all entities owned and controlled by AACPH.

This statement is approved by AACPH's Board of Directors.



Ben Frewin
Chairman

About this Statement

This statement has been prepared pursuant to s11 of the Commonwealth *Modern Slavery Act 2018* (the Act) and is the second modern slavery report for the reporting entity.

AACPH's offices are located at Level 7, 601 Pacific Highway, St Leonards, NSW, 2065. This statement applies to every wholly owned entity of the Parent Entity and will be referred to collectively in this statement as Allity (Allity).

What is Modern Slavery

At its broadest, the term 'modern slavery' refers to a large range of exploitative crimes. The Australian regulatory scheme defines modern slavery to incorporate conduct that would constitute an offence under existing human trafficking, slavery and slavery-like offence provisions set out in the Commonwealth Criminal Code. Modern slavery therefore encompasses slavery, servitude, child labour, forced labour, human trafficking, debt bondage, slavery-like practices, forced marriage and deceptive recruiting for labour or services.

Reporting Criteria 1 - About Allity

Allity is a privately owned residential aged care provider which currently owns and operates 43 homes across Australia.

We aim to provide quality care and services in home-like environments where our residents are always valued and respected and a place where they are proud to call "Home".

'Allity' is derived from the word 'All'. Our approach to providing care for our residents and our staff is all encompassing. Be it our relationships, the way we engage with the community, friends and relatives or our carers, we are committed to 'giving our all' as we strive to make every day the best it can be for everyone around us.

Our Vision

From the very beginning, our vision has been clear 'To Change the Face of Aged Care' and in doing so, change how aged care is perceived.

Our Mission

To 'Make every day the best it can be' is how we support the achievement of our Vision. A commitment to making every day the best has meaning for everyone, whether it be for our residents, their families or our employees.

Our Values

Allity strives to ensure our values are embedded in everything we do, they are:

- Respect
- Integrity
- Passion
- Accountability
- Teamwork
- Innovation

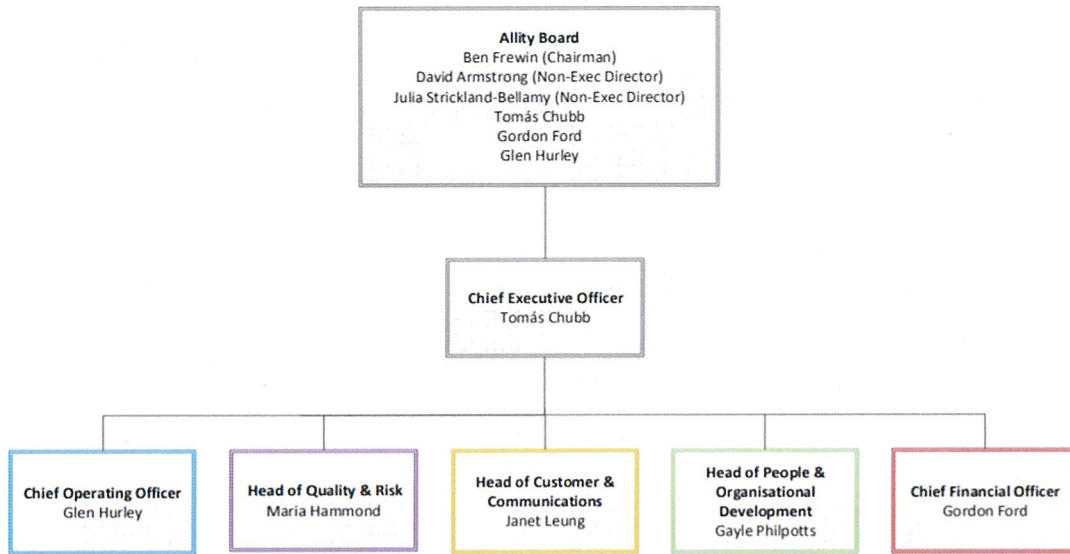
Reporting Criteria 2 - Allity's Structure, Operations and Supply Chains

The Allity structure includes the Parent Entity, consolidation entities and inactive entities. However, all entities within the Allity Group operate for the direct or indirect purpose of providing residential aged care and retirement village operations and management services wholly within Australia.

Allity currently operates 43 residential aged care homes across NSW, VIC, QLD and SA. Allity also currently operates or manages one retirement village and a small number of serviced apartments. Allity's workforce consists of approximately 4,100 employees.

Allity has a robust corporate governance framework in place. The Allity Board is responsible for overseeing Allity's operations and reviewing key areas of risk including human rights risk. Recommendations are made to the Board by key stakeholders below.

Board & Executive Leadership Team



Supply Chains

Allity procures a broad range of goods and services across the business to support its operations. Allity’s supply chain is diverse and encompasses small local businesses through to national and global supply chains.

Examples of Goods

- Medical equipment
- Medical consumables
- Furnishings
- Food supply
- Textiles
- Building materials
- PPE equipment
- Office Supplies

Examples of Services

- Allied Health
- Nursing agency staff
- Cleaning
- Trade services for refurbishments and maintenance
- Lifestyle and entertainment
- Specialised IT systems
- Waste Management

This reporting year, a range of new suppliers were engaged to provide the required PPE equipment for staff during the COVID-19 outbreak. This included ordering equipment such as gloves and face masks in accordance with Federal and State legislative requirements.

Reporting Criteria 3 - Risks of modern slavery practices in Allity's operations and supply chains

Allity has identified that its procurement of cleaning services, catering services, security services, information technology services and building/landscaping services, including the materials used in provision of those services are at a risk of modern slavery due to the nature of the role and the skill level required.

Allity's procurement of clothing and apparel (such as uniforms), medical supplies and equipment (including PPE items), foods and textiles (such as linen and bedding) and construction materials are also at risk of modern slavery.

Reporting Criteria 4 - Actions taken to assess and address risk

The emergence of the COVID-19 pandemic

The 2020-2021 reporting year has proven to be a very challenging time due to the emergence of the COVID-19 pandemic, particularly for the aged care sector.

The impact of COVID-19 on residential aged care has been significant, resulting in considerable resources and time being redirected to keeping residents safe. Allity has been no exception to this with 43 homes located across Australia.

As a result of Allity's homes being located in States with multiple COVID-19 cases during the reporting year Allity focused its attention on preparing for outbreaks and rallying when they unfortunately occurred. This meant a large team of staff on the ground and executive staff across Allity were required to work night and day to ensure our residents continued to receive optimal care with the risk of COVID-19 minimised. Allity experienced ten separate outbreaks within the reporting year and continues to be at risk of further outbreaks.

Regrettably, this has meant that many initiatives that Allity was undertaking needed to be paused to ensure our residents were safe.

FY2020/21 Modern Slavery Risk Mitigation Initiatives

Allity recognises that modern slavery risk may occur in our organisation and extended supply chain. We are aware the level of risk is influenced by factors such as vulnerable populations, product and service category, industry and geographic location.

Within our own business, Allity acknowledges that modern slavery risks associated with workforce characteristics, due to the nature of the work and required skillset, are the most significant in our operations. The nursing and care sector is subject to industry enterprise agreements to ensure fair pay and working conditions for at-risk labour. Allity regularly liaises with unions and each home has the opportunity to appoint a union representative.

Additionally, staff have access to internal grievance mechanisms and an anonymous whistleblowing hotline which is operated by a third party.

To further mitigate this risk, standard supplier agreements were updated in FY20 to include specific requirements surrounding modern slavery and have continued to be used. This is aimed at ensuring suppliers of goods and services contracted by Allity agree to comply with all Modern Slavery Laws and Allity’s Modern Slavery Code of Conduct. Suppliers are also contractually required to notify Allity of any actual or suspected Modern Slavery in its supply chain which has a connection to Allity and to provide all reasonable assistance to support Allity’s own Modern Slavery compliance.

Allity has a comprehensive set of policies and procedures that articulate its values, work processes and expectations of employees and suppliers. These policies and procedures are regularly reviewed and updated. The following policies are the most relevant in addressing modern slavery risks within Allity and our supply chain:

Policy/procedure	Purpose
Employee Handbook	How we expect Allity Employees to behave in the workplace towards each other and our consumers.
Grievance Resolution Policy and Process	Sets out our internal grievance procedures including assessment, investigation and remediation.
Modern Slavery Code of Conduct	Outlines our expectations of suppliers and contractors to comply with modern slavery legislation and working cooperatively with Allity to mitigate risks.
Whistleblowing Policy	Sets out misconduct subject to whistleblowing, mechanisms for reporting and protections provided to whistle-blowers.
Corporate Governance Policy	Outlines the framework, including the mechanisms, processes, roles and responsibilities by which Allity is controlled and directed.
Feedback Management Policy and Procedure	Provides Allity’s clear and consistent approach to complaints handling.
Enterprise Agreements (EAs)	Across the Allity group to ensure fair conditions and wages for a majority of our team members.

The above policies and procedures are aimed at mitigating the risk of modern slavery.

FY2021/22 Commitments

Due to the novel circumstances as set out above, some of the planned commitments for FY21 have been rolled over to FY22. Whilst the COVID-19 pandemic is still at large, Allity recognises that we can no longer postpone our important initiatives and as such have made the below commitments.

Supplier questionnaire - Updated and planned for distribution to 'first tier' suppliers to assess modern slavery risk within Allity's supply chain. 'First tier' suppliers are those who Allity has previously identified as being more at risk and those that service Allity in the greatest way proportionately.

Allity engages third party labour providers. Many of these workers are immigrants, temporary migrant workers, international students, or other vulnerable groups who may be less aware of their rights and subsequently, susceptible to exploitation.

The questionnaire is aimed at reviewing the risk of modern slavery practices. Specific risks will be reviewed by Allity's legal team.

Review of major suppliers - In the first half of 2022 Allity plans to undertake a full review of a number of major suppliers, in particular food suppliers. There will be a re-tendering process to which modern slavery risk mitigation will be reviewed and required. Allity will be undertaking a review of all high risk suppliers as part of this process, in particular those that supply PPE.

Modern slavery reporting register - Creation of an internal modern slavery reporting register to allow Allity to track any potential or suspected breaches of the Act in its own organisation or by suppliers.

Plans Beyond 2022

Allity has identified additional and ongoing actions for the future to ensure a more robust risk mitigation strategy for modern slavery moving forward. This includes the following:

- Training and capacity building in Allity's key stakeholders and team members responsible for procurement on risk identification and due diligence processes.
- Other employees and management will be provided education to build awareness of global modern slavery to raise awareness of risks, and be able to identify and confidently report incidents.
- Continued cooperation with our suppliers to ensure that Allity partners with suppliers that share our modern slavery commitment.
- Update existing policies to ensure a more robust framework to identify and mitigate modern slavery risks.

Reporting Criteria 5 - Assessing the effectiveness of our actions

Allity will assess the effectiveness of the above actions through a variety of review mechanisms including:

- Annual review of the effectiveness of our policies and procedures relating to modern slavery, and assessing if they have served their purpose in the day to day aspects of the organisation. Policies and procedures will be updated as required.
- Annual risk assessment audit of suppliers.
- Regular review and improvement of Allity's due diligence processes as they relate to suppliers.
- Review of risks reported internally or externally, for example, via whistleblowing, grievance process etc.
- Workplace pulse surveys conducted bi-annually. Employees can anonymously provide feedback about satisfaction, working conditions etc.

Reporting Criteria 6 - Process of Consultation with entities owned or controlled

All the entities within the Allity Group have been fully consulted in this process