

MODERN SLAVERY STATEMENT

2021/22

Making every day the best it can be



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Disclosure Note

This statement is a joint statement made by Australian Aged Care Partners Holdings Pty Limited (**AACPH**), ACN 162 265 983, the parent entity of the Allity group of companies. This statement relates to AACPH and all its subsidiaries, which are referred to collectively in this statement as Allity (**Allity**).

This statement was approved by the Board of Australian Aged Care Partners Holdings Pty Limited on 30 November 2022.



Patrick McIntosh AM CSC

Chairman

Acknowledgement of country

AACPH acknowledges all Aboriginal and Torres Strait Islander Traditional Owners of Country throughout Australia and recognises their connection to land, sea, culture and community. We pay our respect to Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander Peoples.

About this Statement

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

AACPH and its subsidiaries were acquired by RSL Care RDNS Limited (as trustee of the RSL (Qld) War Veteran's Homes Trust) trading as Bolton Clarke (ACN 010 488 454) (**Bolton Clarke**) on 28 February 2022. Bolton Clarke is Australia's largest not-for-profit provider of residential aged care, retirement living and home care throughout Australia, operating nationally and internationally.

AACPH's offices are located at Level 7, 601 Pacific Highway, St Leonards, NSW, 2065.

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 residential aged care provider that owns and operates 43 homes across Australia.

Allity aims to provide quality care and services in a home-like environment where residents are always valued and respected and live in a place that 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. Our values are:

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

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

The Allity structure includes AACPH, consolidation entities and operating entities. All entities within the Allity Group operated for the direct or indirect purpose of providing residential aged care and retirement village operations and management services wholly within Australia.

Allity operates 43 residential aged care homes across NSW, VIC, QLD and SA. Allity also operates or manages two retirement villages and a small number of serviced apartments. Allity's workforce consists of approximately 4,400 employees.

Allity has a robust corporate governance framework in place.

From 1 March 2022, the Bolton Clarke Board assumed overall responsibility for the governance of Allity. Recommendations are made to the Board by key stakeholders from the business.

Supply Chains

Allity directly 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

Over the last two reporting years 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 and gloves), foods and textiles (such as linen and bedding) and construction materials are also at risk of modern slavery.

Allity is aware of media reports relating to the alleged use of forced labour in Malaysia to manufacture gloves, and the reported links to Ansell. To this end, Allity made immediate enquiries of its major PPE supplier regarding these gloves in order to make informed purchasing decisions going forward.

Reporting Criteria 4 - Actions taken to assess and address risk

The COVID-19 pandemic

During the FY2021-2022 reporting year, Allity continued to experience operational challenges as a result of the COVID-19 pandemic. The impacts were particularly prevalent in 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.

As a result of Allity's homes being located in States with COVID-19 cases during the reporting year, Allity continued to focus its attention on risk infection prevention and mitigation.

Unfortunately, this has meant that many initiatives that Allity had planned to undertake have been temporarily paused.

FY2021/2022 Modern Slavery Risk Mitigation Initiatives

Allity recognises that modern slavery risk may occur in the 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 to include specific requirements surrounding modern slavery. 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 whistleblowers.

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. Going forward, the Allity and Bolton Clarke policies will be reviewed and aligned with a continued focus on identifying and mitigating the risk of modern slavery.

FY2022/2023 Commitments

As a result of Bolton Clarke acquiring AACPH, this will be the final Modern Slavery Statement for AACPH.

For the FY2022/23 Bolton Clarke has developed a number of focus items to address modern slavery risks. These include:

Training

In the FY2022/23 reporting period the intention is to refresh the training roll out to the new team members of the Procurement and Legal teams, as well as extending the training to key purchasing decision makers in ICT, Property, Operations, Hotel Services and People and Culture.

Supplier Engagement

Modern slavery engagement discussions to continue with suppliers aimed at improving their understanding and knowledge of the expectations and practical application of modern slavery risk assessments.

Due Diligence

Increasing due diligence and risk assessment in supplier selection and supplier management programs and maintaining supplier selection and evaluation practices to reflect modern slavery requirements.

Supplier Questionnaire

Utilising the supplier self-assessment questionnaire to provide a more in-depth view of the highest risk suppliers. Reviewing action plans undertaken by those suppliers that completed the questionnaire in the previous reporting period to ensure agreed action plans are being progressed.

Review of modern slavery risk within highest risk suppliers

Utilising the services of a third-party subject matter expert to conduct a deeper dive into the highest risk suppliers. This includes following up on previous reports obtained on the medical consumable suppliers and an initial review of labour hire suppliers.

Supplier segmentation framework

Progress the development of the Supplier Segmentation Framework which is used by procurement in conjunction with supplier assessments for a more detailed understanding of the Modern Slavery risk within the supply chain.

Reporting Criteria 5 - Assessing the effectiveness of our actions

Regrettably some of the planned commitments from the previous reporting period will be rolled over to FY2022/2023 and incorporated into the next Modern Slavery Statement for Bolton Clarke.

Allity has assessed the effectiveness of its actions during the reporting period by:

- Reviewing 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.
- A 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 which allow 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 Allity have been fully consulted in this process.