

Reaching out in solidarity

Modern Slavery Statement
2021



ST JOHN OF GOD
Health Care

Disclosure note

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

St John of God Hawkesbury District Health Campus Ltd (ACN 608 054 379);

St John of God Outreach Services (ACN 064 831 965);

St John of God Foundation Inc (ARBN 066 805 132);

St John of God Midland Health Campus Ltd (ACN 152 874 845);

Dencross Pty Ltd (ACN 086 647 298);

St John of God Berwick Health Campus Ltd (ACN 606 404 915); and

Marillac (ACN 050 463 717)

(together, for the purposes of this statement "St John of God Health Care")





Contents

Roadmap	2
About us	3
Vision, Mission and Values	3
Our initiatives in 2021	4
Our plans for 2022 and beyond	6
Statement from the Group CEO	7
<hr/>	
Reporting criteria 1 & 2	8
Our organisational structure	9
Our governance framework	10
Our people	10
Our operations	10
Our supply chain	12
<hr/>	
Reporting criteria 3	13
Operational risks	13
Supply chain risks	14
Our COVID-19 response	16
<hr/>	
Reporting criteria 4	18
Modern slavery gap analysis	18
Modern slavery action plan and roadmap	22
<hr/>	
Reporting criteria 5	23
Effectiveness assessment	23
<hr/>	
Reporting criteria 6	24
Process of consultation with owned or controlled entities	24
<hr/>	

Roadmap

2019

Initial awareness and mobilisation

Engage with Catholic peer and industry groups

Undertake due diligence activities

2020

Approach

Conduct risk assessment and gap analysis

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

Deployed training to steering committee

Develop policies and processes

Engage with high priority tier 1 suppliers

Establish working group

Launch awareness and communication campaign

2021

Extend and involve

Updated agreement and RFx templates to include modern slavery clauses

Added modern slavery clauses in new agreements (top tier supplier, ICT and PPE categories)

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

Reviewed and updated business maturity assessment

Review approach/framework

Reviewed change impact assessment

Add top 25 suppliers to the SEDEX platform

Reviewed policies and procedures

Extended risk assessment beyond tier 1 suppliers

Reviewed goals, targets and KPIs

Partner with ACRATH to communicate the impact of modern slavery

2022

Effectiveness review and monitoring

Launch campaign to improve communication and awareness

Refine our supplier engagement and communication approach

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



About us

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

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

We are one of Australia's largest Catholic health care providers, employing more than 15,500 people.

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

Vision

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

Mission

To continue the healing mission of Jesus.

Values

Our core Values reflect our heritage and guide our behaviours:

Hospitality

A welcoming openness, providing material and spiritual comfort to all.

Compassion

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

Respect

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

Justice

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

Excellence

Striving for excellence in the care and services we provide.

Our initiatives in 2021

Modern slavery working group

We have established a cross-functional working group from supply and procurement, workforce, legal and policy, international health, mission and corporate affairs.

Partnership with other Catholic health care providers

We joined the Australian Catholic Anti-Slavery Network (ACAN) for a further two years to leverage their strength and expertise across Australia's largest network of Catholic hospitals and aged care service providers. We have also partnered with Australian Catholic Religious Against Trafficking in Humans (ACRATH) for a series of Formation events to improve awareness of modern slavery.

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

Supplier surveys

As part of ACAN and CNA, we expanded our previous survey of our top 25 suppliers to the top 50 to understand their procurement and sourcing practices. We use the information for risk assessment and vendor management.

Contract management

We progressed with executing variations to contracts, including the new anti-slavery clauses for the top 50 of our suppliers. In addition, we commenced including the new anti-slavery provisions in new contracts with the 15 suppliers.

We included modern slavery provisions in the templates of high-risk procurement categories for consideration in new contracts. In addition, we extended this action to the personal

protective equipment (PPE) and the information communication and technology (ICT) category suppliers to ensure that we manage the supply chain risk in more detail

Risk assessment and framework

As in 2020, independently of ACAN, we reviewed our supply chain risks to use as basis for discussion with our vendors and have put in place actions across the management cycle.

We expanded the work done identifying and conducting a taxonomy risk assessment of our top 50 suppliers to 565 suppliers. We are in the process of inviting our leading tier suppliers to join the SEDEX platform to work together to understand modern slavery risk in the supply chain. In addition, we are varying the contract terms to include clauses addressing modern slavery risks across our top tier information communication and technology (ICT) with an annual spend of \$15 million and personal protective equipment (PPE) with a yearly spend of \$9 million.

Ethical sourcing guidelines

We revisited the ethical sourcing guidelines and the *Social Responsible and Ethical Business Practice Statement*. We translated the statement from English to Tetun to be used by our International Health Division in Timor-Leste as a Statement of Commitments by suppliers. We have not extended the use of the ethical sourcing guideline beyond the top 50 St John of God Health Care suppliers while we are conducting a review of our *Environmental Sustainability Strategy*. Once the overarching strategy is approved, we plan to incorporate the guidelines into our environment and sustainability policy under the sustainable procurement and supply chain section.

Supplier Code of Conduct

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

Modern Slavery Policy

The *Modern Slavery Policy* was approved by the Board in March 2021. To align to this policy the *Social Responsible and Ethical Business Policy* was also reviewed and amended in October 2021 to include statements relating to the support of eradication of modern slavery by managing and mitigating modern slavery risk within St John of God Health Care operations and supply chains.

Education and training

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

Governance and reporting

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

Change impact assessment

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

Communication

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

We also rolled out a range of mass communication via our electronic channels both internally and externally to promote understanding and awareness of modern slavery, leveraging the International Day for the Abolition of Slavery.

Action plan

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

Our plans for 2022 and beyond

Risk assessment

Following the extension of our risk assessment to include the top 565 suppliers, we will review and update the analysis as we improve our understanding of the supply chain risk in their environment.

We have engaged our top 50 suppliers with a detailed review of the risks in their supply chain and will extend this to the top 75.

Education and training

We will develop job-specific training in the high risk areas for facilities managers, supervisors and coordinators.

We will roll out *Modern Slavery 101 Business Relevance, Implementing a Modern Slavery Risk Management Program, Grievance Mechanism and Remedy, and Modern Slavery Risk Management for Suppliers* training through our learning and development platform for inclusion in mandatory training for key caregivers in the procurement and supply chain division during 2022.

Contract management

We will continue to complete and execute variations to contracts, to include the modern slavery provisions for our top 50 suppliers, and across the leading tier suppliers in the information communication and technology (ICT) and personal protective equipment (PPE) categories.

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

Supplier compliance framework

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

We will continue to develop and implement supplier compliance frameworks, such as screening, ongoing evaluation, and auditing.

We will include the ethical sourcing declaration in our supplier onboarding system and explore other opportunities to improve supplier practices through collaboration, relationship management and training for suppliers.

Change management

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

Governance and reporting

We will continue to develop KPIs to monitor effectiveness and oversight to the St John of God Health Care executive team and Board.

We will evaluate mechanisms, such as whistleblowing.

Statement from St John of God Health Care Board Chair and Group CEO

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

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

We recognise that this can be insidious and difficult to detect, particularly within supply chain management, and we apply principles of good corporate governance and foster an ethical and responsible organisational culture to reduce the risk.

The eradication of modern slavery requires a team approach and we work in close partnership with our suppliers and contractors to meet our human rights obligations and adopt fair and transparent practices when choosing and working with suppliers.

We are making steady progress and remain deeply committed to working with government and other organisations to help eradicate the practice and existence of modern slavery.

We are pleased to present our second modern slavery statement.

This statement has been reviewed and approved by the St John of God Health Care Board.



Hon Kerry Sanderson AC CVO

Dr Shane Kelly



Reporting criteria 1 & 2

About St John of God Health Care

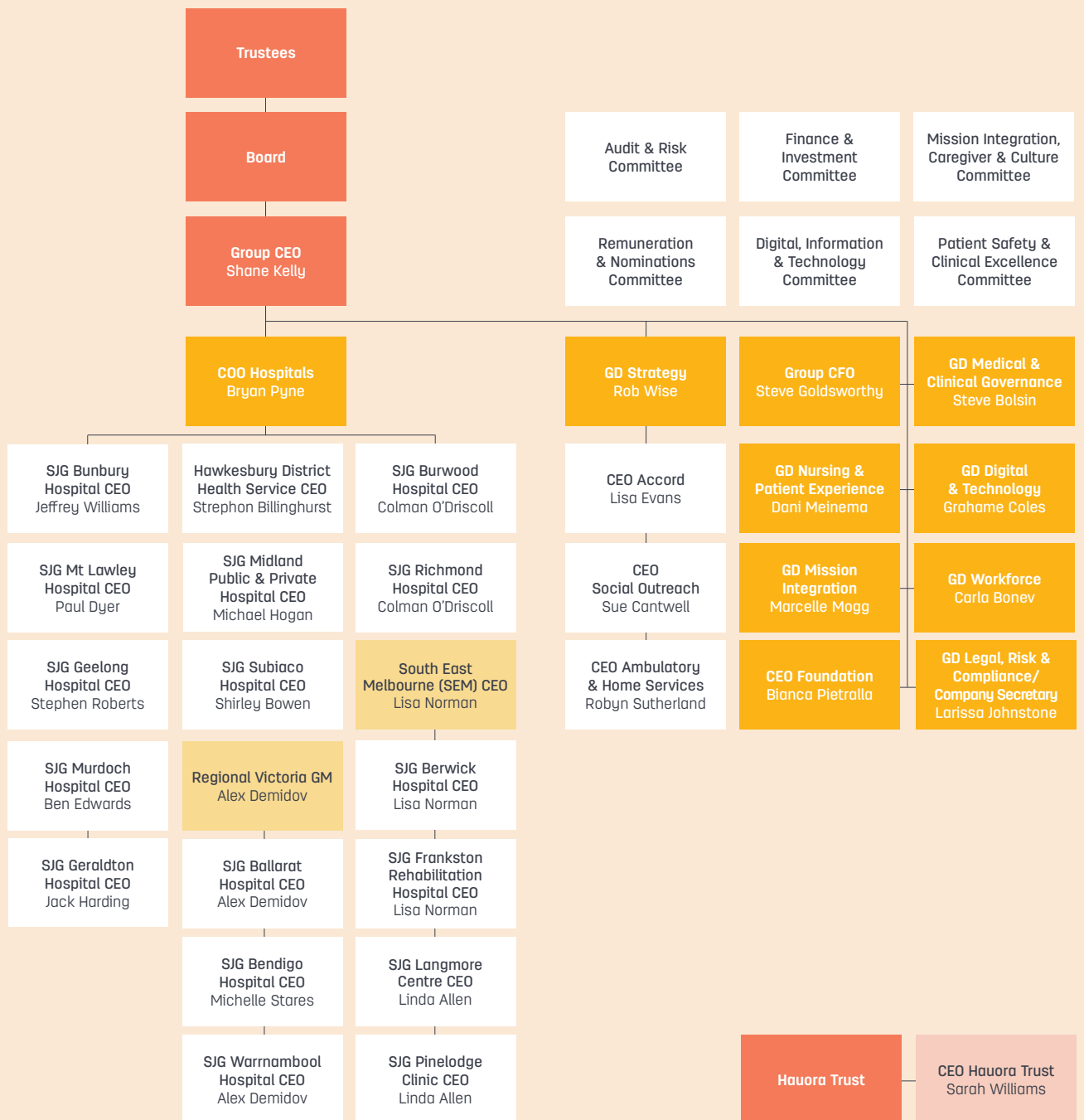
Governance and organisational structure

St John of God Health Care Inc. is an incorporated association, the members of which are the directors of St John of God Australia Ltd, a civil and canon law entity established in 2004 to sponsor the ministry that was previously sponsored by the Sisters of St John of God.

The Sisters are members of St John of God Australia Ltd and share sponsorship of the ministry with eight of the dioceses in which the group operates as well as the Hospitaller Order of St John of God.



Our organisational structure



Our governance framework

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

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

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

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

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

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

Our people

St John of God Health Care employs more than 15,500 people across Australia and the Asia-Pacific region.

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

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

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

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

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

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

Our operations

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

Hospital operations and nursing

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

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

We operate two public hospitals under public private partnerships (PPPs), St John of God Midland Public Hospital in Western Australia and Hawkesbury District Health Service in New South Wales.

In total, we have 3,356 beds. In 2020-21 we treated more than 380,000 overnight and same day patients. We deliver more than 10,000 babies every year and are the biggest provider of private maternity services in our home state of Western Australia.

We also provide home nursing. In 2019-20, we delivered more than 78,000 episodes of care.

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

St John of God Social Outreach

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

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

Services include:

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

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

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

St John of God Accord

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

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

St John of God Health Care at Home

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

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

- After hospital clinical care at home
- Postnatal home assistance for families who have recently welcomed a new baby
- Rehabilitation in the home provided by therapists to enable patients to continue to build their strength and endurance after treatment or surgery in hospital

St John of God Foundation

Our fundraising arm, called the St John of God Foundation, exists to provide support for state-of-the-art advancements in medical technology and research carried out at our hospitals.

Group services and corporate functions

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



Our supply chain

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

What we buy:

- Medical and pharmaceutical products
- Food and beverages
- Energy and utilities (including fuel)
- Maintenance spares and services
- Electronics and electrical equipment
- Labour and corporate services
- Digital information and technology

In 2020 we had 153 active contracts and \$760 million non-payroll procurement spend with our suppliers where annual spend is >\$50,000 across approximately 4,800 suppliers.

In 2021 we had 201 active contracts and \$808 million non-payroll procurement spend across approximately 4,300 suppliers. We have established long-term relationships with most of our suppliers, the majority of which are located in Australia and comprise 98 per cent of our total expenditure. 80 per cent of our procurement spend is with 179 suppliers.

Our supply chain: Key statistics

\$808m
spend with suppliers

4,300
Approximately 4,300 suppliers

~201
Active contracts

15
Categories

Reporting criteria 3

Modern slavery risks in our operations and supply chain

Operational risks

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

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

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

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

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

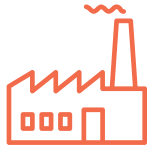
Internal audits are undertaken in relation to specific areas of risk for the organisation. The internal audit program operates in accordance with an internal audit charter and an annual internal audit plan.

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

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

Supply chain risks

In 2021, we identified our highest risk suppliers according to the risk indicators below.



Industry sector

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

Commodity /product

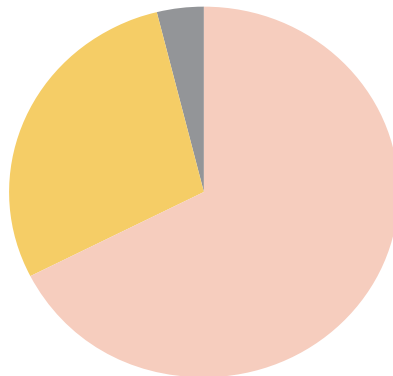
Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.

Geographic location

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

Workforce profile

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



Suppliers classed according to risk with total spend

- **67.5%**
\$416,830,857, 366 suppliers are in the high risk category
- **28.7%**
\$177,452,453, 161 suppliers are in the medium risk category
- **3.8%**
\$23,694,817, 38 suppliers are in the low risk category

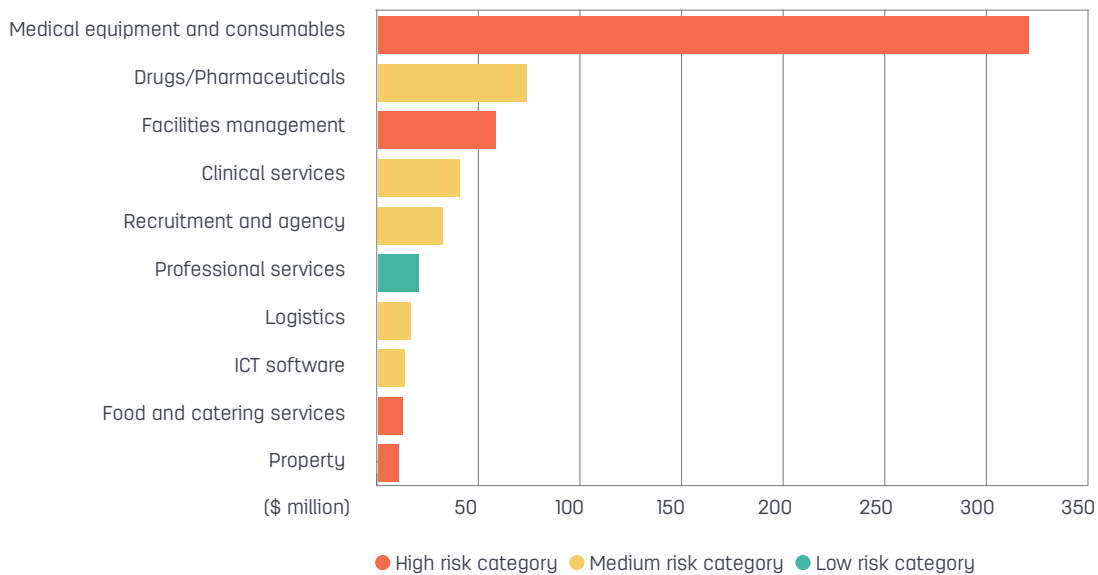
The total spend for the top 13 per cent of suppliers for whom the risk assessment was completed amounts to \$617,978,127 million.

Using these categories above, we identified that the high risk spend is within four spend categories: medical equipment and consumables, facilities management, food and catering services and property management services (67 per cent).

These four highest risk spend categories are made up of 565 suppliers out of 4,300 suppliers.

Our focus for 2021 has been on the top 50 suppliers within high risk categories, which we also extended to suppliers in two additional categories (PPE with spend of \$8 million and ICT with spend of \$29 million) with plans in place to extend our focus during the next 12 months.

Modern slavery risk by spend category



Donations to St John of God Foundation

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

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

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

Our COVID-19 response

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

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

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

We established a *Coronavirus Sprint Steering Committee* to implement the COVID Response Hospital Operation Plan with accountability for the execution of “Sprints” by the Sprint team, led by GCEO, and comprising all critical functions of the organisation, including the supply and procurement team. The Sprint Leads (Clinical Sprints and Non-Clinical Sprints) are accountable to the COVID Management Directors to execute Sprints

The worldwide shortage of personal protective equipment (PPE) has been well documented as a key risk to the health care sector throughout the pandemic. St John of God Health Care faced the same challenges as other providers in this regard.

St John of God Health Care, led by our supply and procurement team established a comprehensive approach to managing our critical services and supply chain during the COVID-19 pandemic, undertaking the following actions:

- Performed an analysis across all new suppliers who claimed that they could provide PPE
- Reviewed the origin of the products before new suppliers added to our supplier pool
- Performed a clinical assessment and approval before PPE was made available to frontline staff
- Requested top 50 suppliers to sign the Social Responsible and *Ethical Business Practice Statement*



Reporting criteria 4

Actions taken to assess and address risk

St John of God Health Care commenced action to assess and address the risks of modern slavery in 2021 across our top 75 suppliers.

Modern slavery gap analysis

We conducted a maturity/gap review during Dec 2021 to measure against our previous gap assessment on how we are tracking in our approach to the modern slavery risks.

The results showed a relatively low level of maturity across the key indicators of management systems, risk management, human resources and recruitment, customers and stakeholders, and procurement and supply chain.

St John of God Health Care has progressed significantly from this initial gap analysis and commenced initiatives across all the listed categories above.



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



All of our 2021 initiatives have been achieved since this gap analysis:

Modern slavery working group

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

Partnered with other Catholic health care providers

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

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

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

Supplier surveys

As part of ACAN and CNA, we expanded our previous survey of our top 25 suppliers to the top 50 to understand their procurement and sourcing practices. We use the information for risk assessment and vendor management.

Risk assessment and framework

Following the extension of our risk assessment to include the top 565 suppliers, we will review and update the analysis as we improve our understanding of the supply chain risk in their environment.

We have engaged our top 50 suppliers with a detailed review of the risks in their supply chain and will extend this to the top 75.

Ethical sourcing guidelines

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Education and training

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

Governance and reporting

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

Change impact assessment

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

Vendor onboarding

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

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

Modern slavery action plan and roadmap

Action plan

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

Year 1 / 2019 Awareness and Mobilisation	Year 2 / 2020 Approach	Year 3 / 2021 Extend and Involve	Year 4 / 2022 Effectiveness Review & Monitoring
Establish working group	Conducted risk assessment and gap analysis	Review approach/ framework	Improve communication and awareness campaign
Review and understand obligations under the Act	Performed a change impact assessment	Extend risk assessment beyond tier 1 suppliers	Improve supplier engagement and communication
Engaged with Catholic peer and industry groups	Reviewed St John of God Health Care Code of Conduct and existing policies relating to investment, donations, and whistleblower and developed new Modern Slavery Policy and processes as required	Review goals, targets and KPIs	Extend SEDEX adoption across all tier 1 suppliers
Undertook due diligence activities	Established regular reporting	Complete all top 50 suppliers' contract variations	Rollout modern slavery training to a broader group of caregivers
Engaged Board and Audit and Risk Committee.	Engaged with high priority tier 1 suppliers (top 50)	Review and update our supply risk assessment and present progress	Revisit assessment and show maturity improvement
Established communication with ACAN	Updated governance framework	Implement <i>Modern Slavery 101</i> training for caregivers as identified through gap analysis and change impact	Operationalise supplier risk assessment
Identified top tier suppliers	Develop and deployed initial training for working group	Extend the inclusion of the modern slavery clauses into next 50 suppliers	Embed supplier engagement on modern slavery practices and supply chain risk in annual/ quarterly contract review meetings
Commenced engagement with suppliers to commit to ethical sourcing	Conducted system maturity review and established a baseline	Confirm changes to policy and procedures with all Facilities Managers and ensure 100 per cent compliance	Improve supplier annual performance measures to include modern slavery risks and feedback from regular meetings
Formed working group	Identified KPIs	Revisit <i>Bridge the Gap</i> assessment and show maturity improvement	Extend modern slavery to a broader group of caregivers
	Launched awareness and communication campaign		
	Changed the vendor onboarding process and documentation	Updated agreement and RFx templates to include modern slavery clauses	
	Commenced contract reviews for the top 50 suppliers to include the modern slavery clauses	Revisited Change Impact Assessment	
	Reviewed the supply chain risk associated with COVID-19 and undertook range of actions	Added top 25 suppliers to SEDEX platform	
	Reviewed and updated the <i>Supplier Code of Conduct</i> and published on St John of God Health Care website	Reviewed modern slavery policies and procedures	
	Prepared first Modern Slavery Statement	Partnered with ACRATH to communicate the impact of modern slavery to improve awareness across St John of God Health Care	

Reporting criteria 5

Effectiveness assessment

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

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

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

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

Indicator / target	Achieved
Re-assessed the business maturity across the main modern slavery criteria	Yes
Extended the supplier risk assessment across a broader range of supplier and categories	Yes
Included contract variations across top tier, PPE and ICT suppliers	Yes
Partnered with ACRATH to communicate the impact of modern slavery to improve awareness across St John of God Health Care	Yes
Continued partnership with ACAN and CNA partners for a further term.	Yes
Reviewed and updated modern slavery policies and procedures	Yes
Added / on-boarded top 25 suppliers to the SEDEX platform	Yes
Re-assessed the change impact required for modern slavery across the organisation	Yes
Included modern slavery training in the St John of God Health Care learning and development platform	Yes

Reporting criteria 6 Process of consultation with owned or controlled entities

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





