



Southern Cross Care (NSW & ACT)

Modern Slavery Statement

2023



Reporting period:
1 January 2023 – 31 December 2023

Acknowledgement of Country

Southern Cross Care (NSW & ACT) acknowledges the Traditional Owners of the land upon which we work and live. We pay our respects to the Elders past, present and emerging, for they hold the memories, the traditions, the culture and hopes of Aboriginal and Torres Strait Islander peoples.

We believe that a better understanding and respect for Aboriginal and Torres Strait Islander cultures will assist us to better engage with our Aboriginal and Torres Strait Islander residents/clients and staff. An enriched appreciation of Australia's long cultural heritage is essential to the maturity of Australia as a nation.

Southern Cross Care (NSW & ACT) Limited

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Head office. 16-18 Bridge Street, Epping NSW 2121 | ABN: 76 131 082 374

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About Southern Cross Care (NSW & ACT)

Southern Cross Care's (SCC) commitment to enhancing the lives of older Australians is encapsulated in its expansive network of compassionate services, including Home Care, Retirement Communities, and Residential Aged Care facilities. Embedded in over 40 diverse locales, SCC reaches deep into the heart of regional communities, which often face unique challenges and have distinct needs.

Our human-centered approach is powered by the deeply ingrained HEART values—honesty, empathy, acceptance, respect, and teamwork. These values not only infuse life into the culture of care but also shape the policies and interactions with all stakeholders,

ensuring an environment where the elderly can thrive, not just survive.

Our dedication to creating inclusive, supportive communities is evidenced in every facet of our operations, from the design of living spaces to the development of engaging, enriching programs that cater to the physical, mental, spiritual, and social well-being of each individual.

Recognising the importance of ethical integrity, SCC remains unwavering in its adherence to ethical practices, staunchly upholding the rights and dignity of every individual. Our Modern Slavery Statement is more than a document—it's a manifesto of SCC's journey towards a more transparent, responsible, and just world. By implementing rigorous oversight of our operations and supply chains, we are able to challenge industry norms and setting new standards for what it means to operate free from exploitation and injustice.



Message from the Chair



At Southern Cross Care (SCC), we are honoured to continue a rich tradition of compassionate care in the Australian aged care sector, a tradition characterised by profound respect and unwavering support for our elders. This commitment, born from a deep sense of community and humanitarian spirit, drives us to confront the complex challenges of modern slavery and human trafficking with both determined resolve and profound empathy.

Few are as vulnerable as those ensnared in the grip of slavery and trafficking. Pope Francis, championing this cause, calls upon us to abandon indifference and rise to action. As stewards of this mission, the Board of SCC is resolute in our commitment, guided by both our heritage and our pursuit for justice.

Recognising the magnitude of this task, we have strengthened our collaboration with the Australian Catholic Anti-Slavery Network (ACAN). Together, we leverage our collective influence to combat modern slavery in all its forms.

In this, our fourth Statement, we reflect on our progress from January 2023 to December 2023, focusing on supply chain mapping and risk assessment. Transparency and integrity are paramount as we strive for best practices in our operations and relationships with suppliers. Our 2023 Modern Slavery Statement builds upon our collective achievements, laying the foundation for a future where no one suffers under the chains of modern slavery.

As Chair, I am immensely proud of our organisation's dedication to this cause. Our relentless pursuit of justice and compassion reflects the very heart of who we are: a community built on honesty, empathy, acceptance, respect, and teamwork. Together, we uphold the dignity of every individual, especially those who suffer in the shadows.

Principal Governing Body Approval Date

This Modern Slavery Statement was approved on 26 March 2024 by the principal governing body of Southern Cross Care (NSW & ACT), ABN 76 131 082 374, as defined by the Modern Slavery Act 2018 (Cth) ("the Act"). This Modern Slavery Statement is signed by a responsible member of Southern Cross Care (NSW & ACT), as defined by the Act.

A handwritten signature in black ink, appearing to read 'Lawrie Hallinan', written over a white background.

Lawrie Hallinan
Chair, Southern Cross Care (NSW & ACT)



Our Structure, Operations and Supply Chains

Structure

SCC is dedicated to innovating in the not-for-profit aged care sector. We are guided by a commitment to improvement and transformation, ensuring our practices and services genuinely meet the evolving needs of our communities. Our innovative approach is reflected in our comprehensive services and dedicated team, driving forward a new era of care centred on the needs and well-being of our community.

Registered with the Australian Charities and Not-for-Profits Commission and structured as a company limited by guarantee, we anchor our mission in integrity and service, devoid of share capital, ensuring our focus remains squarely on those we serve.

Located at 16-18 Bridge Street, Epping, NSW, our head office serves as a collaborative hub where we coordinate extensive care and services across all our sites. Reflecting

our transparent ethos, we've designated procurement@sccliving.org.au as a dedicated channel for all matters concerning modern slavery, emphasising our commitment to ethical operations.

In the fiscal year 2023, our total revenue reached \$234,600,000. This financial success has enabled us to expand and refine our services across a broad network that includes Retirement Villages, Home Care services, and Residential Care homes, covering more than 40 locations. Our commitment to delivering personalised, high-quality care and support is unwavering, especially in extending these services to regional communities, ensuring everyone has access to the care they need.

By February 2024, our passionate team had grown to 2,162 members, embodying diverse roles from full-time warriors of compassion to part-time angels of care, coming together to create a supportive and enriching environment.



Operations

Our operations are enhanced by a robust network of 1,904 suppliers, ensuring the seamless delivery and continuous improvement of our services. Most of these suppliers are based in Australia, and align closely with our values of integrity and accountability, reinforcing our dedication to bolstering our local supply chain.

Supply chains

Our supply chain is diverse, covering areas such as facilities management, services for domestic and client needs, medical supplies and equipment, and human resources services. Additionally, we work with professional services, information technology, utilities, corporate support, and vehicle fleet management to ensure comprehensive support and efficiency across all aspects of our operations.

Guided by our commitment to ethics, our Modern Slavery Working Group actively oversees and ensures compliance, embodying our dedication to justice and ethical conduct. Their diligent efforts are directly communicated to our CEO, ensuring a cascading effect of accountability and transparency up to SCC's Board, keeping modern slavery matters at the forefront of our operational ethos.

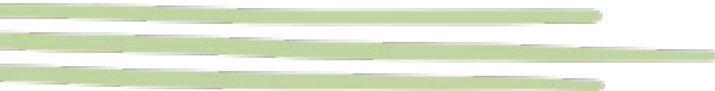


SCC operates 40 facilities throughout NSW & ACT, delivering services to residents and clients in both regional and metropolitan areas.

Modern Slavery risks in our operations and supply chains

SCC sources a wide range of products and services from various industries and undertakes diverse activities to achieve its strategic objectives.

Throughout 2023, SCC undertook several initiatives to assess the potential risks of modern slavery within our operations and supply chains. Through these endeavours, we identified risks across our supplier categories, leading us to implement a variety of measures based on this newfound understanding.



Supplier and category risk assessment matrix

In 2023, we initiated a robust Supplier and Category Risk Assessment, targeting our top 50 suppliers based on expenditure and risk, using the ACAN Category Risk Taxonomy to understand industry-wide Modern Slavery challenges.

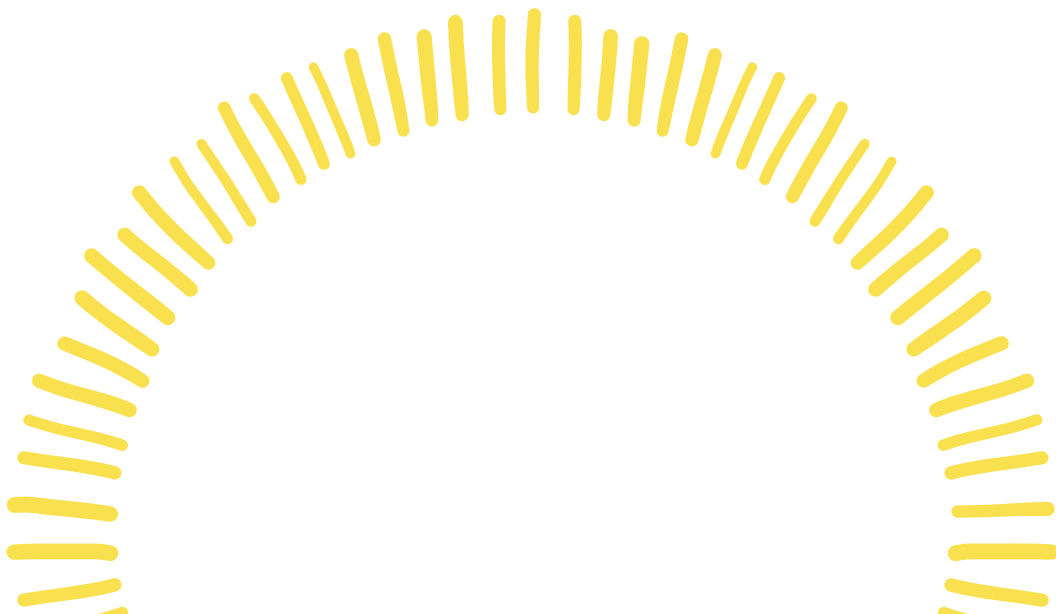
Understanding the intricate and global nature of supply chains in the aged care sector, which often extends into regions where modern slavery practices are more prevalent, we've recognised the urgent need to go beyond conventional risk assessments. Our approach has been to integrate comprehensive insights and benchmarks from across our industry, acknowledging that the challenges we face are not isolated but part of a broader industry-wide issue.

Our commitment extends beyond mere assessment; we're dedicated to forging deeper, more meaningful relationships with our suppliers. This commitment translates into a series of actions: conducting detailed vendor reviews with an emphasis on modern slavery concerns, and establishing a two-way dialogue that goes beyond the standard modes of communication like emails and website updates. We're innovating in the ways we connect and sharing best practices aimed at not just

informing but actively engaging our suppliers in meaningful discussions on ethical practices.

The cornerstone of our strategy is our Modern Slavery Policy, Modern Slavery Statement, and Supplier Code of Conduct. These are not just documents but are expressions of our core values and commitments. They serve as a foundation for our actions and interactions with our suppliers, underscoring our dedication to ethical conduct and the welfare of individuals in our supply chain.

Taking a step further, we have set a new standard for our top 100 suppliers by expenditure, moving from passive compliance to active commitment. We now require these suppliers to review and officially endorse SCC's Modern Slavery Attestation Statement. This is not just a formality but a declaration of our collective commitment to combat modern slavery, reinforcing our expectations for ethical practices and transparency.



Actions taken to assess and address risks

Throughout 2023, SCC has been steadfast in our commitment to eradicating Modern Slavery from our operations and supply chains. A cornerstone of our strategy has been our active membership and collaboration with the Australian Catholic Anti-Slavery Network (ACAN), a partnership that reflects our belief in the power of collective action against Modern Slavery.

Joining ACAN in February 2020 marked a significant step forward for SCC. It signified our recognition of the complex challenges Modern Slavery presents and our commitment to joining forces with like-minded organisations to foster meaningful change. Our collaboration with ACAN is ongoing; we are not only sharing our Modern Slavery statement with the network but also integrating insights and strategies from across the member base. This cooperative effort culminates in a joint submission to the Modern Slavery public register, amplifying our shared commitment to transparency and accountability.

In maintaining our engagement with ACAN throughout 2023, we've reinforced our anti-slavery initiatives, particularly through the active involvement of our procurement team. Their participation in ACAN's monthly Modern Slavery meetings has been instrumental in driving forward our agenda against Modern Slavery, leading to significant developments:

- The re-launch of our Modern Slavery whistleblower hotline, providing a secure and confidential channel for reporting potential abuses within our supply chain.
- The distribution of a Modern Slavery Self-Attestation Statement to our top 50 suppliers, ensuring they align with our commitment to ethical practices.
- A comprehensive review of a key supplier's supply chain and Modern Slavery program, reflecting our dedication to due diligence and collaborative improvement.
- The development and implementation of SCC's Action Plan, a strategic framework guiding our anti-slavery efforts.
- The creation and deployment of a comprehensive Modern Slavery training and education program, aimed at raising awareness and understanding within our organisation and among our partners.

These actions represent SCC's multifaceted approach to combating Modern Slavery, demonstrating our ongoing dedication to fostering safe, ethical, and transparent supply chains, both within our organisation and across the wider community.

Modern Slavery working group

Throughout the year 2023, SCC's dedicated Modern Slavery Working Group met six times, demonstrating our active commitment to combating Modern Slavery. The group, which holds quarterly meetings, consists of a cross-functional team of eight members from diverse departments including Marketing and Communications, People & Culture, Information Technology, Care Operations, and Procurement. This collaboration ensures a holistic approach to tackling Modern Slavery, with a commendable yearly attendance rate of 75% from our members, reflecting their dedication and commitment to this critical cause.

The presence of the Australian Catholic Anti-Slavery Network (ACAN) at our Modern Slavery Working Group meetings has been invaluable. ACAN's expert perspectives and insights have significantly contributed to the group's ability to achieve meaningful outcomes, enhancing the breadth and depth of our strategies.

Under the collective guidance and concerted effort of the Working Group, we have driven the effectiveness of our Modern Slavery program. Our approach is comprehensive and collaborative, ensuring that initiatives and actions aimed at mitigating instances of Modern Slavery in our operations and supply chains are well-informed and targeted. The group draws on the thoughtful contributions of all members, leveraging their diverse expertise to address the multifaceted challenges Modern Slavery presents.

Looking ahead to 2024, we are committed to maintaining the momentum of these quarterly meetings. Our aim is to continue

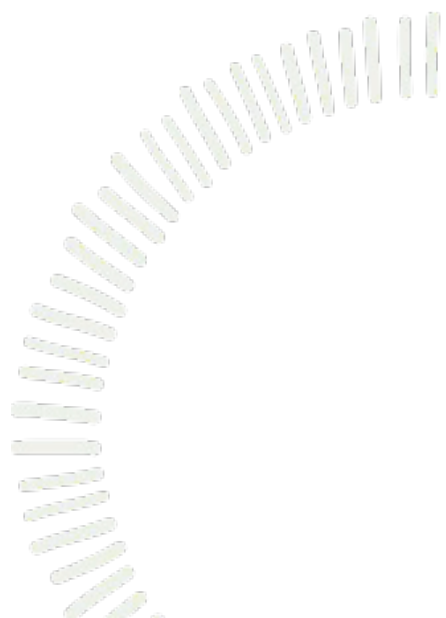
advancing our initiatives, refining our actions, and enhancing our overall strategy to combat Modern Slavery. By doing so, we reinforce our commitment to ethical practices and the dignity of all individuals within our operations and broader supply chains.

Whistleblower hotline

At SCC, we hold ourselves to the highest standards of integrity and responsibility. We have zero tolerance for improper conduct within our ranks, whether among our employees, officers, or volunteers. Our commitment runs deep. We stand firmly beside those brave whistleblowers who step forward to shine a light on any form of misconduct. They are not just voices in the dark; they are beacons of truth, guardians of our values.

In 2023, we took significant steps to empower our employees and strengthen our stance against unethical practices, including Modern Slavery. We re-launched our Whistleblower hotline, a confidential channel encouraging employees to report any form of corrupt, illegal, unethical, or undesirable behaviour.

As we move forward, SCC reaffirms its dedication to cultivating an environment



of transparency and respect, where every individual feels valued and heard. Our actions in 2023 are just the beginning of a continued journey towards ethical excellence and the protection of human dignity. We invite every member of our community to join us in this vital mission, to stand against injustice, and to contribute to a culture where integrity is not just expected, but exemplified.

Modern Slavery statement

In July 2023, SCC took a meaningful step forward by publishing our Modern Slavery Statement on our corporate website. This initiative is not just about compliance or transparency; it's a reflection of our deeper commitment to ethical stewardship and care for all creation.

By making the statement accessible to clients, suppliers, residents, staff, and the wider public, we aim to broaden awareness of our dedicated efforts against Modern Slavery.

This publication underscores our journey towards sustainability and ethical responsibility. We are committed to creating a culture and an environment where every member of our community is respected, protected, and valued.

Modern Slavery self-attestation statement

SCC has taken a proactive stance in our commitment to integrity and care for the global community by creating a Supplier Attestation Statement against Modern Slavery. This document serves not only as a declaration of our unwavering opposition to Modern Slavery but also as an invitation

for our suppliers to align with our ethical standards, echoing the integral connection between respect for human dignity and the stewardship of our world.

In 2023, we extended this commitment by distributing the Modern Slavery Self-Attestation Statement to our top 50 suppliers, urging them to review, complete, and endorse the document. This collaborative effort marks a significant step forward in our joint mission to promote a just and ethical global community, resonating with the holistic approach to care for all individuals and our common home.

Training and education program

SCC has embraced a robust educational initiative on Modern Slavery, underscoring our dedication to cultivating a workplace where awareness, compassion, and ethical practices are at the core of our operations.

This commitment to enlightenment and action is reflected in the comprehensive training provided to our Board, Executive Team, and all employees, ensuring a unified understanding and approach to combating Modern Slavery across all levels of our organisation.

In 2023, we enhanced our educational framework, integrating a Modern Slavery e-learning module for our workforce, which

has been systematically incorporated into the orientation process for all new recruits. This strategic approach not only aligns with our evolving initiatives but also provides a platform for continuous learning, open dialogue, and constructive feedback through updates to the Modern Slavery content on our intranet.

SCC's robust Modern Slavery training program has achieved an impressive 87% completion rate among our Executive Management and Head Office staff, with our Board and Executive members leading by example with a 100% completion rate. Meanwhile, Head Office members accomplished an 88% rate, and the initiative for new recruits has also taken a strong hold, with a 79% completion rate among new starters. These figures highlight our collective commitment to combating Modern Slavery throughout our organisation.

The spotlight on Modern Slavery continued at our annual conference in November 2023, where the issue's global repercussions and our targeted efforts to mitigate these challenges were thoroughly examined. This segment not only educated but also engaged our senior management and facility managers, fostering a collective commitment to change.

Through these varied yet cohesive educational strategies, SCC is setting a precedent in the fight against Modern Slavery, embodying our commitment to

global stewardship and ethical responsibility. This holistic approach not only aligns with our core values but also strengthens our resolve to ensure the dignity and safety of all individuals impacted by our operations.

Grievances and remediation of modern slavery

SCC firmly encourages all employees, suppliers, and individuals within our supply chain to voice any concerns related to Modern Slavery, guaranteeing confidentiality and the option of anonymity. We provide a dedicated channel for anyone to report breaches of our Supplier Code of Conduct confidentially to our Procurement team. In the event of such a breach, we commit to engaging with the concerned supplier within 24 hours to collaboratively address and rectify the issue, with the support of the Australian Catholic Anti-Slavery Network (ACAN).

Recognising the complex nature of remediation, SCC leverages the expertise and support of ACAN to ensure that individuals affected by Modern Slavery receive the best possible care and assistance. This partnership enables us to facilitate meaningful recovery and rehabilitation processes, ensuring that our efforts are transparent and accountable.

While the year 2023 saw no reported cases of Modern Slavery grievances within SCC, our commitment to vigilance remains unwavering. We continue to stand ready to support and assist any individuals affected by Modern Slavery, reinforcing our pledge to ethical practice and the protection of human rights across all aspects of our operations and supply chain.

Assessing our effectiveness

The mechanisms and initiatives SCC has instituted to gauge the effectiveness of our strategies in combating Modern Slavery risks are multifaceted and comprehensive. Our Procurement team, in collaboration with the Modern Slavery Working Group, spearheads our due diligence efforts and engagement strategies, assessing the impact and efficacy of our actions both within our operations and throughout our supplier network. This dedicated team also takes on the critical role of reviewing feedback from suppliers and addressing any queries or concerns related to Modern Slavery.

In addition, the progress and findings of the Modern Slavery Working Group are regularly communicated to our Senior Executive team, ensuring that those at the highest level of our organisation are informed and involved in our anti-Modern Slavery efforts. The Board of Directors, too, stays updated on all Modern Slavery-related developments through briefings from our Chief Executive Officer.

Despite not identifying instances of Modern Slavery within our operations or supply chains in 2023, we understand that this does not confirm the total absence of such issues. As a result, we continue to scrutinise the efficiency of our key mechanisms and continually evaluate the training and education provided to our staff and suppliers, ensuring that our collective understanding and vigilance regarding Modern Slavery are both current and effective.



Key actions

In alignment with commitment to the dignity of all people and the stewardship of our global community, SCC is dedicated to continuing and enhancing our efforts against Modern Slavery in 2024. Our approach is holistic, emphasising care for people and the planet, and includes the following focused objectives:

	SCC Goals	Target	Date	Responsibility
1.a	Build on and expand on Modern Slavery information on the SCC intranet.	Update and enhance Modern Slavery content on the intranet.	2024	Procurement
1.b	Attend monthly Modern Slavery ACAN webinars.	Ensure consistent attendance and participation.	Monthly	Procurement
1.c	Continue to educate and train SCC staff to understand and recognise the signs of Modern Slavery.	Deliver ongoing training programs.	2025	People & Culture, Procurement
1.d	Remind SCC staff about SCC's commitment and obligations under the Modern Slavery Act.	Conduct regular awareness sessions.	Bi-annually	People & Culture, Procurement
1.e	Include a Modern Slavery segment in the annual SCC conference.	Include Modern Slavery segment in the conference agenda.	Annual	Care Operations, Procurement
1.f	Attend quarterly Modern Slavery Steering Committee meetings.	Ensure representation at all quarterly meetings.	Quarterly	Procurement
1.g	Ask our top 75 suppliers by spend to review and sign SCC's Modern Slavery Attestation Statement.	Achieve 100% review completion from top 50 suppliers. Achieve 100% supplier agreement from top 50 suppliers.	2026	Procurement
1.h	Develop a strategic partnership with a current vendor for a joint initiative to help combat Modern Slavery.	Form a strategic partnership and initiate a joint project.	2025	CEO, Procurement
1.i	Include relevant SCC stakeholders in vendor reviews and include Modern Slavery as an area of discussion.	Incorporate Modern Slavery topics into vendor reviews.	2025	Procurement

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