

MODERN SLAVERY
STATEMENT 2020



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

2 Roadmap

3 About us

- 3 VISION, MISSION AND VALUES
- 4 OUR INITIATIVES IN 2020
- 5 OUR PLANS FOR 2021 AND BEYOND
- 6 STATEMENT FROM BOARD CHAIR AND GROUP CEO

8 Reporting criteria 1 & 2

- 8 OUR GOVERNANCE AND ORGANISATIONAL STRUCTURE
- 9 OUR ORGANISATIONAL STRUCTURE
- 10 OUR GOVERNANCE FRAMEWORK
- 10 OUR PEOPLE
- 10 OUR OPERATIONS
- 11 OUR SUPPLY CHAIN

12 Reporting criteria 3

- 12 OPERATIONAL RISKS
- 13 SUPPLY CHAIN RISKS
- 15 DONATIONS TO ST JOHN OF GOD FOUNDATION
- 16 OUR COVID-19 RESPONSE

18 Reporting criteria 4

- 18 MODERN SLAVERY GAP ANALYSIS
- 21 MODERN SLAVERY ACTION PLAN AND ROADMAP

22 Reporting criteria 5

- 22 EFFECTIVENESS ASSESSMENT

24 Reporting criteria 6

Roadmap

2021

Effectiveness review and monitoring

- Review approach/framework
- Extend beyond Tier 1 suppliers
- Review goals, targets and KPIs
- Rollout Australian Catholic Anti-slavery Network (ACAN) Modern Slavery 101 training to key St John of God Health Care caregivers, as identified

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 working group
- Develop policies and processes
- Engage with high priority Tier 1 suppliers

2019

Initial awareness and mobilisation

- Establish working group
- Launch awareness and communication campaign
- Engage with Catholic peer and industry groups
- Undertake due diligence activities

About us

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

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 14,500 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, Mission and Values

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 values reflect our heritage and guide our behaviours:

Hospitality

A welcoming openness, providing material and spiritual comfort.

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 2020

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) to leverage strength and expertise across Australia's large network of Catholic hospitals and aged care service providers.

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

Supplier surveys

As part of ACAN, we undertook a survey of our top 25 suppliers to understand their procurement and sourcing practices. This information is used for risk assessment and vendor management.

Risk assessment and framework

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

We also identified and conducted a risk assessment of our top 50 suppliers and are in the process of varying their contract terms to include clauses addressing modern slavery risks.

Separately, we have reviewed and approved new modern slavery clauses which will be included in categories of procurement contracts.

Ethical sourcing guidelines

We have developed ethical sourcing guidelines and have a *Socially Responsible and Ethical Business Practice Statement*, which 48 of the top 50 St John of God Health Care suppliers doing business with us have signed. This commits them to follow ethical procurement and sourcing practices across labour hire, workforce management, product sourcing and other associated areas.

Supplier Code of Conduct

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

Modern slavery policy

We have commenced developing a *Modern Slavery Policy*, outlining underpinning principles, requirements, supplier and business partner engagement, reporting and governance.

Education and training

All members of the working group undertook Modern Slavery 101 training, developed by ACAN, to commence building organisational understanding and knowledge.

Governance and reporting

We have put in place 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 an assessment of changes needed across St John of God Health Care to help us put in place internal changes to identify and address modern slavery.

Communication

We commenced an organisation-wide communication plan to raise awareness of modern slavery. This will explain the roles and responsibilities of caregivers and our consulting specialist doctors, and what things might change. It will explain how we will work with government and other organisations to eradicate modern slavery.

Action plan

We have 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. This is part of a broader three-year roadmap.

Our plans for 2021 and beyond

Risk assessment

We will review and update our supply risk assessment.

Education and training

We will develop job-specific training in the high risk areas for facilities managers, supervisors and coordinators. This will be rolled out via our online learning and development platform and will be mandatory for procurement and supply employees in 2021 and for other caregivers as identified through our risk assessment the following year.

We will also roll out *Modern Slavery 101* training across the organisation to raise awareness and ensure caregivers understand how to identify and either address or escalate risks.

Contract management

We will complete and execute the variations to contracts, which include the new anti-slavery clauses for our top 50 suppliers, and commence the inclusion of the new anti-slavery clauses in existing contracts with the next 50 suppliers.

The newly approved modern slavery clauses will be included in the templates of high-risk procurement categories for contracts going forward.

Supplier compliance framework

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

We will 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 the Board Chair and Group CEO

Statement from St John of God Health Care Board Chair the Hon Kerry Sanderson AC CVO and Group CEO Dr Shane Kelly.

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.

In the tradition of the Sisters, we place great emphasis on compassionate care and the dignity of the human person.

We do not support or condone modern slavery or the exploitation of people in any form, but we recognise that it can be hidden and difficult to identify.

It requires a clear organisational framework, active focus from management, and good governance at Board level to reduce the risks through our supply chain and other parts of our operations.

It also requires a partnership approach, and we are working with our suppliers and other stakeholders, to take joint responsibility for action.

We are making good progress and have a longer term roadmap in place.

We are pleased to present our first modern slavery statement and to take our place working with government and other organisations to help eradicate the practice and existence of modern slavery.

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

Hon Kerry Sanderson AC CVO

Dr Shane Kelly



This document addresses specific criteria as laid out in the Modern Slavery Act 2018 (Cth)

Reporting Criteria 1 & 2

More about St John of God Health Care

Our 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 14,500 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 50.5 per cent are professional nurses and midwives, 81 per cent are female and 58.7 per cent work part-time, with a further 22 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.

St John of God Health Care favours a permanent workforce over casual workers and agency personnel, a commitment that is captured in our relevant enterprise bargaining agreements. Agency and casual nurses or personal care assistants are mainly used to supplement our permanent caregivers and assist in filling unexpected short-term absences, or meeting shortfalls in fluctuating rosters if permanent staff are not available. We monitor their usage weekly and while there are variations across hospitals and services, they usually comprise less than three per cent of our workforce in all states on any given week.

We discern our use of agencies carefully and negotiate a panel of agencies to provide staff as required. Each agency is required to comply with enterprise bargaining agreements and must warrant terms and conditions no less favourable than our own employees.

In addition to agency and health care professional casuals, St John of God Health Care engages a small number of casuals in higher-risk areas such as housekeeping, cleaning and security, often through third-party contractors. Like all our suppliers, these providers are subject to a review of contracts at present, but recognising the higher risk of these categories, St John of God Health Care will undertake a more specific review of these suppliers and the underlying risk in the coming 12 months.

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 3,374 beds. In 2019-20 we treated more than 350,000 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, including acute, post-acute and community services to privately and publicly funded clients, through St John of God Healthcare at Home. In 2019-20, we delivered more than 89,000 episodes of care.

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

SOCIAL OUTREACH SERVICES

St John of God Health Care allocates a percentage of eligible revenue to community and youth services programs, administered by St John of God Social Outreach.

These include:

- Community mental health services provided by St John of God Mental Wellbeing Services
- Support for families experiencing perinatal anxiety or depression through St John of God Raphael Services
- Support for people with drug and alcohol dependence (publicly funded), and
- Accommodation services for people experiencing or at risk of homelessness through St John of God Horizon House and Casa Venegas.

St John of God Social Outreach also works with a number of Governments and local healthcare providers in the Asia Pacific region to support them to build sustainable and high quality programs and capacity building of their healthcare workforces.

These include:

- Timor-Leste - supporting the Timorese government and our counterparts to build healthcare capacity through sustainable, long term development programs to improve patient outcomes and experience, develop health care skills and implement self-sustaining, quality healthcare.
- Papua New Guinea - St John of God Social Outreach support the Brothers of St John of God, to operate the first drop-in centre in the nation for people experiencing mental health issues, located in Madang.

DISABILITY SERVICES

We provide disability services across 43 sites in Victoria through St John of God Accord and at a range of locations in New Zealand, through St John of God Hauora Trust.

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 healthcare organisation, our direct supply chain consists primarily of healthcare 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 and technology

In 2019 we had 134 active contracts and \$721 million non-payroll procurement spend with our suppliers where annual spend is >\$50,000. 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 100 suppliers.

Our supply chain: key statistics

\$721m spend with suppliers

Approx. 5,000 suppliers

~134 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.

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 has the accountability for embedding and maturing the organisation's approach to enterprise risk management and compliance, as well as the internal audit function.

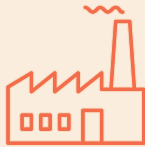
Internal audits are undertaken in relation to specific areas of risk, both at a divisional and organisational-wide level. The internal audit program operates in accordance with an internal audit charter and an annual internal audit plan.

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 2020, 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.



CATEGORY RISK TAXONOMY

Specific products and commodities deemed as high risk according to the category risk taxonomy specifically developed for ACAN entities.



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).

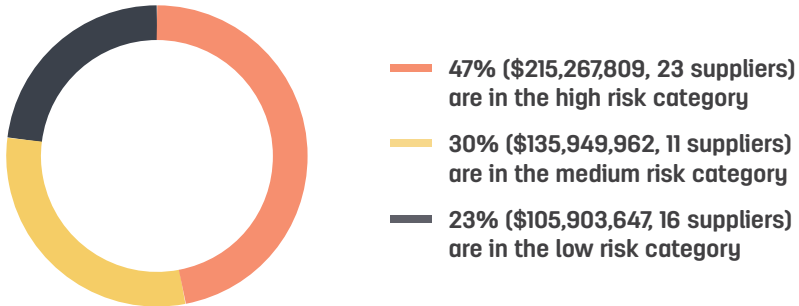
The total spend for the top 50 suppliers for whom the risk assessment was completed amounts to \$457,121,418 million.

Using these categories above, we identified that the high risk spend is within three spend categories: medical equipment and consumables (87 per cent), building construction and fabrication services (nine per cent), and property and facility maintenance (four per cent).

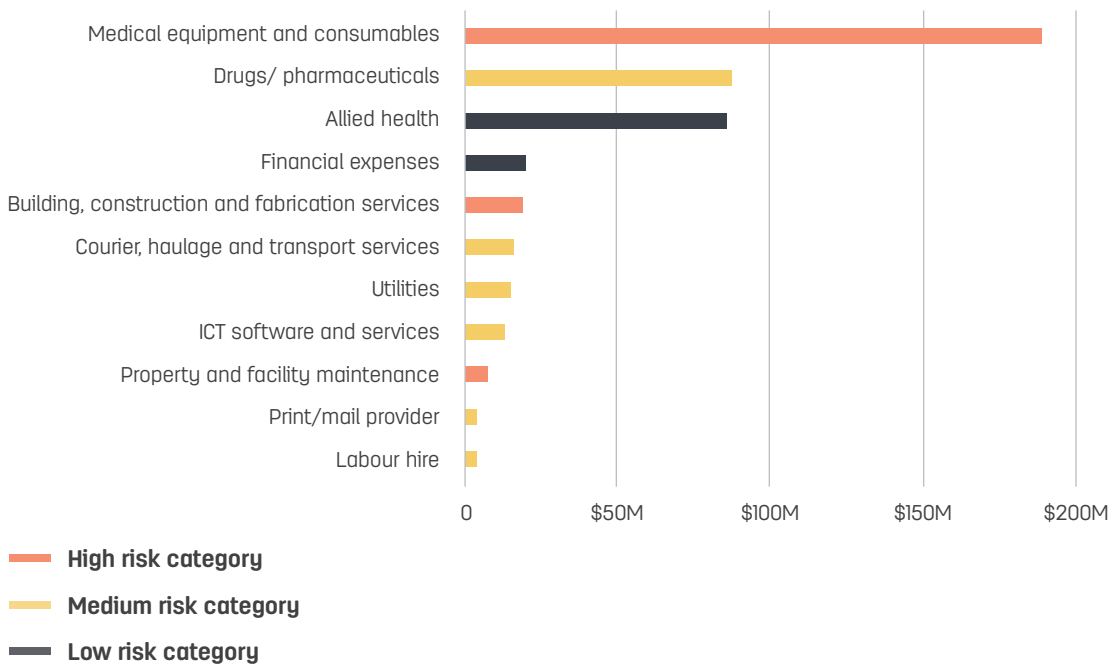
These three highest risk spend categories are made up of 23 suppliers out of our top 50 suppliers.

Our focus for 2020 has been on the high risk categories, with plans in place to extend our focus during the next 12 months.

SUPPLIERS CLASSIFIED ACCORDING TO RISK WITH TOTAL SPEND



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 Emergency Response Group* in January 2020, led by medical services, and comprising all critical functions of the organisation, including the supply and procurement team. This team has led our organisational response to the crisis across infection control, intensive care unit (ICU) capacity, contact tracing, development of telehealth, training and upskilling, clinical education, supply and procurement, communication and a range of other associated initiatives.

The worldwide shortage of personal protective equipment (PPE) has been well documented as a key risk to the health care sector throughout the pandemic. The sourcing of PPE also presented and continues to present the greatest risk of exploitation and modern slavery. 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:

1. Performed an analysis across all new suppliers who claimed that they could provide PPE
2. Reviewed the origin of the products before new suppliers added to our supplier pool
3. Performed a clinical assessment and approval before PPE was made available to frontline staff
4. Requested top 50 suppliers to sign the *Socially 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 2020 across our top 50 suppliers.

Modern slavery gap analysis

We conducted a maturity gap review during July 2020 when we joined ACAN's modern slavery program to identify 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
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 2020 initiatives have been achieved since this gap analysis:

MODERN SLAVERY WORKING GROUP

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

PARTNERED WITH OTHER CATHOLIC HEALTH CARE PROVIDERS

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

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

SUPPLIER SURVEYS

As part of ACAN, we undertook a survey of our top 25 suppliers to understand their procurement and sourcing practices. This information is used for risk assessment and vendor management.

RISK ASSESSMENT AND FRAMEWORK

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

We also identified and conducted a risk assessment of our top 50 suppliers and are updating their contract terms to include clauses addressing modern slavery risks.

ETHICAL SOURCING GUIDELINES

We have developed ethical sourcing guidelines and have in place a *Socially Responsible and Ethical Business Practice Statement*, which most organisations doing business with us, are required to sign. This commits them to follow ethical procurement and sourcing practices across labour hire, workforce management, product sourcing and other associated areas.

SUPPLIER CODE OF CONDUCT

We are developing a *Suppliers Code of Conduct*, which will provide guidelines on the practices, behaviour and other requirements we expect of our suppliers, including compliance with ethical sourcing.

MODERN SLAVERY POLICY

We have commenced developing a *Modern Slavery Policy*, outlining underpinning principles, requirements supplier and business partner engagement, reporting and governance.

EDUCATION AND TRAINING

All members of the working group undertook Modern Slavery 101 training, developed by ACAN to commence building organisational understanding and knowledge.

GOVERNANCE AND REPORTING

We have put in place 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 an assessment of changes needed across St John of God Health Care to help us put in place internal changes to identify and address modern slavery.

VENDOR ONBOARDING

We have amended 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*.

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 (EFFECTIVENESS REVIEW AND MONITORING)
Establish working group	Conducted risk assessment and gap analysis	Review approach/ framework
Review and understand obligations under the Act	Performed a change impact assessment	Extend risk assessment beyond Tier 1 Suppliers
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 <i>Modern Slavery Policy</i> and processes as required.	Review goals, targets and KPIs
Undertook due diligence activities	Established regular reporting	Complete all top 50 suppliers' contract variations.
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
Established communication with ACAN	Updated governance framework	Implement Modern Slavery 101 training for caregivers as identified through gap analysis and change impact
Identified top tier suppliers	Develop and deployed initial training for working group	Extend the inclusion of the modern slavery clauses into next 50 suppliers
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
Formed working group	Identified KPIs	Revisit Bridge the Gap assessment and show maturity improvement.
	Launched awareness and communication campaign	Identify and address more detailed operational risks.
	Changed the vendor onboarding process and documentation	Identify and document metrics for non-supply chain risks.
	Commenced contract reviews for the top 50 suppliers to include the modern slavery clauses.	
	Reviewed the supply chain risk associated with COVID-19 and undertook range of actions	
	Reviewed and updated the <i>Supplier Code of Conduct</i> and published on St John of God Health Care website.	
	Prepared first Modern Slavery Statement	

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
Requirements of the <i>Modern Slavery Act 2018</i> outlined to the St John of God Health Care Board	✓
Requirements of the <i>Modern Slavery Act 2018</i> presented to ARC	✓
General awareness communication shared with the organisation	✓
Modern slavery working group established and formalised	✓
<i>Modern Slavery Policy</i> created and approved	✓
Modern slavery governance and risk framework updated	✓
Modern slavery training for working group members	✓
Top 50 Suppliers identified and risk assessment completed	✓
Engage and work with ACAN and Joint Catholic Procurement Network	✓
First <i>Modern Slavery Statement</i> prepared and approved	✓

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.

