

# **Zenitas Healthcare Modern Slavery Statement FY20**



Zenitas Healthcare Modern Slavery Statement FY20

Contents

1.0	Statement from our CEO	4
2.0	Our structure, business and supply chains	5
3.0	Our operations and supply chains risk	7
4.0	Our Modern Slavery Action Plan	8
5.0	Assessment and reporting	10
6.0	Consultation	11
7.0	Looking ahead	12

*This statement has been published in accordance with Section 54 of Modern Slavery Act 2015 (Transparency in Supply Chains) Regulation 2015 and the Australian Modern Slavery Act 2019.*

*It sets out the steps taken by Zenitas Healthcare, and Relevant Entities, during the financial year ending 30 June 2020 to prevent modern slavery and human trafficking in its business and supply chain.*

*Zenitas Healthcare is a company of Guardian Alphabet Holdco Pty Ltd and this Statement is made under the Guardian Holdco Entity.*

*Other relevant Entities are listed in Annex 1, which fall within the scope of Section 54 of the Act.*

# 1.0 Statement from our CEO

Zenitas Healthcare recognises the importance of combating slavery and human trafficking, as crimes that affect communities and individuals across the globe.

We have a purposeful mission to enable people to live healthier, happier and more independent lives. As part of this mission, we are committed to combating the real and growing problem of modern slavery and human trafficking.

We are wholly opposed to any abuses of a person's freedoms in our direct operations, our indirect operations and our supply chains.

We also expect our people, partners and suppliers to share our commitment to ensuring modern slavery does not exist.

We are pleased to lodge our first Modern Slavery Statement and look forward to delivering further actions to promote and embed human rights, as our businesses grow over time.

**Rob De Luca**  
**CEO | Zenitas Healthcare**



# 2.0 Our structure, business and supply chains

Modern Slavery Reporting Criteria One and Two: Identify the reporting entity and describe its structure, operations and supply chain

## 2.1 About Zenitas Healthcare

Zenitas Healthcare was established in 2016 and provides a full range of healthcare services, including aged care, disability support and accommodation, general practice medicine, physiotherapy, occupational therapy, podiatry, speech pathology and dietetics.

Zenitas means 'peak health' in Latin. We believe that 'peak health' goes beyond physical health and is about overall wellbeing. It's why our range of seamless services support the broader wellbeing needs of our customers.

Zenitas has a unique service model, with our size, scale and multi-modality business allowing us to provide the whole range of health services efficiently.

We have a clear strategy in place to become Australia's leading provider of health, aged care and disability services, including the largest provider of allied health services to people living in aged care residences, and of community care and disability accommodation.

Preventing and addressing our own involvement in modern slavery is central to our values and our commitment to running a safe, responsible and sustainable business.

## 2.2 Our operating model

We operate across three customer-focused businesses.

### Our Health Clinics

Our network of over 60 primary and allied health clinics across Australia are driven by supportive and experienced healthcare professionals and cater to all ages and life stages.

Our Health Clinics provide a full suite of quality services including general practice medicine, preventative health care, physiotherapy, sports medicine, and podiatry.

### Our Mobile Health Care

Our mobile health services provide care to customers in residential aged care facilities and communities around Australia.

We look after their needs with physiotherapy, occupational therapy, podiatry, nursing, speech therapy, and dietetic services.

### Aged Care and Disability Services

Our Aged Care and Disability Services provide personalised services to people living with a disability and elderly customers, so they can live more independently and achieve their goals.

We provide in-home care to aged and disability customers. We also support our customers living with a disability within our accommodation facilities across Australia.

2. Our structure, business and supply chains Continued.

2.3 Our people

Zenitas contracts and employs ~3,500 support workers, ~2,000 therapists and ~200 medical staff. Our large workforce means we have a diversity of skills and experience to draw upon, reflecting the needs of the customers that we serve.

Our organisation serves vulnerable members of the community we have the highest standards when it comes to our safety and conduct. We ensure that all staff and contractors who have or are reasonably likely to have access to our customers, undergo a rigorous safety screening process.

Respecting human rights, including the right to be free from slavery, is inherent in our CARE values of Customer, Accountability, Respect and Excellence.



3.0 Our operations and supply chains risk

Modern Slavery Reporting Criteria Three: Describe the risks of modern slavery practices in the operations and supply chain in the reporting entity

3.1 Our operations and supply chains

The goods and services we buy cover health and administration services, from medical consumables such as personal protective equipment, to cleaning products and waste management, to information technology hardware and software, through to local construction of specialised dwellings.

We have undertaken a gap analysis of our supply chain and identified risks and mitigants across the domains of workforce, country of origin, services and commodities.

Part of our approach to addressing Modern Slavery risk is to help strengthen communities through developing a Corporate Social Responsibility (CSR) agenda, which will include a focus on improved sourcing practices. Our CSR agenda is a key priority for FY21 and will provide an integrated social, community and environmental framework for our operations.

3.2 Addressing Modern Slavery risk

As outlined above, we have commissioned a gap analysis to better understand modern slavery risk across our operations and supply chain. Key risk areas considered in the gap analysis included workforce risk, country risk, service risk and commodity risk.

In relation to workforce risk, areas for attention include a focus on ensuring appropriate protections are in place for casual and seasonal workers.

For country risk, additional due diligence is required for construction and cleaning related suppliers, including hazardous waste in primary and allied health, and a broader review of higher risk commodities such as electronic hardware and PPE.

Service risk identified due diligence for recruitment agencies, construction and cleaning related suppliers.

For commodity risk, attention and due diligence were identified in the higher risk areas of IT and computer equipment, medical consumables, cleaning supplies and printing and stationery.

We recognise the increased modern slavery risk when it comes to our people and are committed to undertaking further analysis of our workforce risk and implementing preventative measures in response. The risks associated with the four domains identified above have been considered and treatments included in a detailed action plan.

A priority going forward will be embedding modern slavery risk into our enterprise risk management systems, to better track, monitor and mitigate.



## 4.0 Our Modern Slavery Action Plan

### Modern Slavery Reporting Criteria

#### Four: Describe the actions taken by the reporting entity to assess and address these risks, including due diligence and remediation processes

##### 4.1 Our Action Plan

We recognise that being in the healthcare industry, we are exposed to risks relating to the potential violation of human rights in areas including modern slavery and human trafficking.

We are conscious that such risks can arise in certain areas of the sector, particularly in areas such nursing and aged care provision, as well as in the manufacturing of healthcare equipment.

We are committed to monitoring such risks in our business and in our wider supply chain and to mitigating them.

We have developed a Modern Slavery Action Plan aims to better manage modern slavery risk across the domains of:

- roles and accountability
- governance and policies
- due diligence and management systems
- supply chain management
- grievance and remediation

##### 4.2 Due diligence and remediation

Key activities occurring in the next reporting period to treat and remediate modern slavery risks across these domains follow:

##### Roles and accountability

- responsibility for modern slavery included in management Position Descriptions
- implement modern slavery risk training module for staff

##### Governance and policies

- include modern slavery risk in Code of Conduct
- Annual gap analysis and risk review
- key policies updated to cover core ILP conventions

##### Due diligence and management systems

- Modern slavery added to Enterprise Risk Register

##### Supply chain management

- Supplier Code developed that embeds management of modern slavery risk
- Standard Terms and Conditions relating to Modern Slavery included in supplier contracts

##### Grievance and remediation

- Protected Disclosure policy updated to include modern slavery

We remain committed to incremental and proactive treatment of risk to better manage against potential modern slavery impact across our businesses.

##### 4.3 Roles and accountabilities

Key management personnel have been identified and made accountable for each domain of our Modern Slavery Action Plan.

Progress against the Action Plan is tracked by our Board twice a year, and this is supplemented by an external reviewer to provide independent advice on areas for improvement.

We will also undertake an annual assessment to understand how our business manages the risk of modern slavery and human trafficking occurring.

A priority for FY21 will be reviewing and strengthening our risk assessment process and implementing a more sophisticated framework to identify key areas of inherent risk.

##### 4.4 Governance and policies

Zenitas is developing a robust corporate governance framework, with the Board overseeing our delivery including our human rights approach.

Underpinning this framework is our suite of policies, several of which are relevant to modern slavery. These include our Code of Conduct, our Procurement Policy and our Whistle-blower Policy.

The development of a dedicated Human Rights policy will be an area of focus in FY21.

##### 4.5 Due diligence and management systems

Our management of modern slavery risk in our operations and supply chain falls within our broader approach to human rights risk and will be assessed and managed consistently with our established enterprise-wide risk framework, and risk reporting tool RiskMan.

Implementing a supply chain review of our labour hire processes and relationships will be an ongoing focus for Zenitas to ensure we are aware of any potential risks and reinforce our expectations in relation to human rights with our suppliers.

##### 4.6 Supply chain management

We recognise there are many challenges that we, in common with other large organisations, face in full transparency across each tier of our supply chain. At present, we are focusing on meaningful due diligence on those who supply goods and services directly to Zenitas.

Zenitas has undertaken preliminary supply chain mapping to better understand areas of key risk.

A key focus for FY21 will be developing and implementing a Supplier Code that embeds human rights expectations when engaging with our business. As outlined above, our CSR agenda will also address responsible sourcing.

##### 4.7 Grievance and remediation

Our staff can raise their issues and concerns regarding labour conditions or workplace grievances, and this process is documented in our Complaints and Grievance Policy. This includes providing channels for anonymous complaints.

Whistle-blower Protections are outlined in our Protected Disclosure Policy. The Policy encourages the reporting of any instances of unethical, illegal, fraudulent or undesirable conduct involving our businesses, and will ensure that people who do decide to make such reports are able to do so without fear of intimidation, disadvantage or reprisal.

A key focus going forward will be extending grievance mechanism to suppliers and ensuring our remediation processes are aligned with the UN Guiding Principles of Human Rights.

## 5.0 Assessment and reporting

**Modern Slavery Reporting Criteria Five: Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks**

**5.1 Assessment of effectiveness of actions being taken**

As detailed above, our Board will assess progress against the Action Plan twice per year. In addition, an external reviewer will provide independent advice on gaps and areas for improvement.

We will also undertake an annual assessment to understand how our business manages the risk of modern slavery and human trafficking occurring. This will include a focus on supplier relations and trends through grievance mechanisms.

## 6.0 Consultation

**Modern Slavery Reporting Criteria Six: Describe the process of consultation with any entities the reporting entity owns**

In developing our Modern Slavery approach, we have engaged our leadership cohort and connected with shareholders and subject matter experts to better understand Modern Slavery risk, and options for treatment.

Internally, we have held interviews and workshops with key management personnel across all lines of business. The aim of these discussions has been to further our knowledge around best practice, benchmarking and insights, and in order to deepen our understanding and prioritise and manage risks.

We recognise that knowledge sharing, including targeted training for employees, and action, including mitigation measures where we see a risk of involvement, are vital to successfully preventing modern slavery.

Over the coming year, we will continue to set clear expectations to support our employees and suppliers to be alert to possible involvement in modern slavery and to reject it.

A key focus for FY21 will be training our wider staffing team to promote awareness of Modern Slavery risk and embed an awareness and understanding of how to respond to this risk.





# 7.0 Looking ahead



## Modern Slavery Reporting Criteria Seven: Any other relevant information

Key areas of focus going forward include:

Roles and accountability	Training our staff in Modern Slavery risks
Governance and policies	Establishing a governing body to manage our Modern Slavery risk
Due diligence and management systems	Embedding Modern Slavery risk in our Enterprise risk management system
Supply chain management	Development of a Supplier Code
Grievance and remediation	Embedding Modern Slavery risk into our Protected Disclosure Policy

We are pleased to make a contribution to this important matter and look forward to continuing to embed a clear and firm approach when it comes to embedding human rights and preventing modern slavery risk across our business.

## Annex 1

Zenitas Healthcare entities covered by this statement are:

- Zenitas Healthcare Pty Ltd
  - Zenitas St Kilda Pty Ltd
  - Zenitas Management Services Pty Ltd
  - BGD Medical Centres Pty Ltd
  - Zenitas Medical Trusco Pty Ltd
  - Modern Medical Group Pty Ltd
  - Zenitas Cityskin Unit Trust
  - Modern Medical Administration Unit Trust
  - Zenitas Medical (WA) Unit Trust
  - Zenitas Dandenong Pty Ltd
  - Comrec Australia Pty Ltd
  - Zenitas Home Care Pty Ltd
  - Live Life Connect Pty Ltd
  - Australian Home Care Services Pty Ltd
  - Healthcare at Home Australia Pty Ltd
  - AHC Care Services Pty Ltd
  - Accommodation & Care Solutions Holdings Pty Ltd
  - Accommodation & Care Solutions Pty Ltd
  - Rehabilitation Care Solutions Pty Ltd
  - Zenitas Caring Choice Pty Ltd
  - Rehabilitation Care Solutions Pty Ltd
- Careseekers Pty Ltd
  - Dimple Group Holdings Pty Ltd
  - Dimple Podiatry Pty Ltd
  - Dimple Dietetics Pty Ltd
  - Dimple Consulting Pty Ltd
  - Dimple Physiotherapy Pty Ltd
  - Transform Wellbeing Pty Ltd
  - Transform Care Pty Ltd
  - Loqui Pty Ltd
  - Murto Pty Ltd
  - Zenitas Ontrac Pty Ltd
  - Zenitas HNA Trusco Pty Ltd
  - Zenitas HNA Pty Ltd
  - HNA Physio (NSW) Unit Trust
  - HNA Physio (QLD) Unit Trust
  - HNA Physio (VIC) Unit Trust
  - LifeCare Physio (VIC) Unit Trust
  - LifeCare Physio (WA) Unit Trust
  - Grantley No. 10 Pty Ltd

## Notes

This image shows a single sheet of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

## Notes

This image shows a single sheet of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins or other markings on the paper.



