

Zenitas Healthcare
Modern Slavery Statement
FY21

This statement has been published in accordance with Part 2 of the Modern Slavery Act (Cth) 2018 (**Act**).

It sets out the steps taken by the Zenitas Healthcare group of companies during the financial year ending 30 June 2021 to prevent modern slavery and human trafficking in its business and supply chain.

This statement was endorsed by the Board of Zenitas Healthcare on 7 October 2021.

Signed:

A handwritten signature in black ink, appearing to read 'Shane Tanner', written in a cursive style.

Shane Tanner, Chair, Board of Zenitas Healthcare

Table of Contents

1.0	Statement from our CEO	p3
2.0	Our structure, business and supply chains	p3
3.0	Our operations and supply chain risks	P5
4.0	Our Action Plan	p5
5.0	Assessment and reporting	P8
6.0	Consultation	p8

1. Statement from our CEO

I am pleased to share Zenitas Healthcare's second Modern Slavery statement.

Zenitas is committed to combatting the problem of modern slavery and human trafficking, as crimes that affect communities and individuals across the globe.

We remain 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 eradicating modern slavery.

Over the past 12 months we have made steady progress in better understanding our modern slavery risk, and establishing activities to combat this risk, including as publishing a supplier code of conduct, and embedding modern slavery risk in our policies and reporting platforms. We also recognise that there is more work to be done, and that ongoing effort is required.

Our mission at Zenitas is to enable people to live healthier, happier and more independent lives. As part of our mission, we will continue to promote and embed human rights, and take clear and purposeful action to combat modern slavery.

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

Rob De Luca

CEO | Zenitas Healthcare

2. Our structure, operations 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 comprises a group of companies that provide a full range of healthcare services, including aged care, disability support and accommodation, general practice medicine, physiotherapy, occupational therapy, podiatry, speech pathology and dietetics.

The ultimate holding company of the Zenitas Healthcare group of companies is Guardian Alphabet Holdco Pty Ltd. This statement is made jointly by Guardian Alphabet Holdco Pty Ltd and the other entities within the Zenitas Healthcare group of companies that are reporting entities for the purposes of the Act (identified in **Annex 1**). In preparing this statement, we have considered the operations of the wholly owned subsidiaries of the Zenitas Healthcare group of companies.

Preventing and addressing 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-focussed businesses.

Plena Healthcare

Plena Healthcare provides allied health services to customers in residential aged care facilities, people with disability and communities around Australia.

Plena offers a full suite of allied health services including physiotherapy, occupational therapy, podiatry, speech therapy, and dietetic services.

Claro Aged Care and Disability Services

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

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

Our Health Clinics

We have a network of over 50 primary and allied health clinics across Australia, delivered under brands including Lifecare, Peninsula Sports Medicine Group, Beleura Health Solutions, Ontrac Physiotherapy and Modern Medical.

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

2.3 Our people

Zenitas contracts and employs ~2,400 support workers, ~1,500 therapists and ~500 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.

As our organisation serves 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 rigorous safety screening and training.

We also acknowledge the inherent supply chain risk in a large and distributed workforce, which is addressed in our Action Plan below.

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

Our CARE values:



3. 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 and any entities it owns or controls

3.1 Our operations and supply chains

The goods and services we buy can be broadly grouped as follows:

- health and administration services including medical consumables such as personal protective equipment
- engagement and procurement of workforce
- information technology hardware and software
- cleaning products and waste management
- local construction of specialised dwellings
- stationery and printing supplies

In FY20, we undertook a detailed gap analysis of our supply chain and identified risks and mitigants across the domains of **workforce**, **country of origin**, **services** and **commodities**. This analysis has assisted to shape our areas of focus for FY21 and FY22.

3.2 Addressing Modern Slavery risk

Key risk areas considered in the gap analysis included workforce risk, country risk, service risk and commodity risk.

In relation to **workforce risk** areas highlighted for attention included ensuring appropriate policy and supplier protections are in place for the engagement of casual and seasonal workers.

For **country risk** due diligence was 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.

The risks associated with the four domains identified above have been considered and treatments included in a detailed action plan which was developed for FY21 and updated for FY22.

4. Our Modern Slavery Action Plan

Modern Slavery Reporting Criteria Four: Describe the actions taken by the reporting entity (and any entities it owns or controls) to assess and address these risks, including due diligence and remediation processes

4.1 Our Action Plan

As a business operating in the healthcare industry, we recognise that 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 as disability and aged care provision, as well as in the manufacturing of healthcare equipment and IT.

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

We have developed an iterative Modern Slavery Action Plan which 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

Our first Modern Slavery Action Plan was developed in FY21 and has been revised and updated for FY22.

4.2 Due diligence and remediation activities from our FY21 Action Plan

A summary of key actions undertaken in FY21 follow:

- **Roles and accountability**
 - o Key management personnel identified and made accountable for modern slavery
 - o Modern slavery governed internally through the establishment of a Responsibility, Inclusion and Diversity Committee chaired by the CEO
 - o Modern slavery progress monitored by Board annually
- **Governance and policies**
 - o Corporate governance framework developed including consideration of modern slavery
 - o Modern slavery risk included in our Code of Conduct
 - o Key policies updated to cover Modern Slavery risk including our privacy policy and onboarding toolkit
- **Due diligence and management systems**
 - o Gap analysis and risk review undertaken in relation to management systems
 - o Modern Slavery added to our Enterprise Risk Register
 - o Modern Slavery added to our Enterprise Risk Management and Incident Reporting Tool
- **Supply chain management**
 - o Supplier Code of Conduct published that sets out expectations of our suppliers
 - o Standard terms and conditions relating to Modern Slavery developed and included in all supplier contracts
- **Grievance and remediation**
 - o Protected Disclosures Policy updated to include modern slavery
 - o Complaints and Grievance Policy published including anonymous reporting channels

4.3 Areas of focus for our FY22 Action Plan

- **Roles and accountabilities**
 - o Reviewing and strengthening our risk assessment process to better identify key areas of inherent risk relating to modern slavery
 - o Code of conduct training to be rolled out and include a module on modern slavery risk
- **Governance and policies**
 - o Recruitment policies to be updated to cover core International Labour Conventions including Freedom of Association, Collective Bargaining, Child Labour, Forced Labour and Non-Discrimination
- **Due diligence and management systems**
 - o Supply chain review undertaken of our labour hire processes and relationships
 - o Develop a consistent approach to engaging labour hire agencies that includes consideration of modern slavery risk
- **Supply chain management**
 - o Ensuring that our Supplier Code and Modern Slavery contract provisions are embedded in all contracts
- **Grievance and remediation**
 - o Extend grievance mechanism to suppliers and ensure our remediation processes are aligned with the UN Guiding Principles of Human Rights

4.7 Corporate Social Responsibility

Part of our approach to addressing Modern Slavery risk is to help strengthen communities through developing a Corporate Social Responsibility (CSR) agenda, which includes a focus on improved sourcing practices.

In FY21 we developed our first CSR Framework which assists us to actively manage environmental and social risks and opportunities. Our CSR commitments follow:

<i>We make a positive and sustainable impact on the lives of our customers, people and on the environment in which we operate</i>				
Our Customers 	Our People 	Our Community 	Our Environment 	Our Suppliers
We're putting the voice of the customer at the centre of our decision making, and providing high quality care and support.	We're creating a values driven and inclusive workplace for all.	We're making a difference through workplace giving and supporting community enterprises to help create stronger and more inclusive communities.	We're caring for our planet by adopting a sustainable approach to managing our business.	We're taking a responsible approach to risk management, governance and reporting to create strong and safe supply chains.

5. 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

Our Board will assess progress against the Modern Slavery Action Plan annually.

In addition, we will engage an external reviewer will be to provide independent advice on gaps and areas for improvement, as required.

We will also undertake regular assessments via our Responsibility, Inclusion and Diversity Council 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. 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 subject matter experts to better understand Modern Slavery risk, options for treatment, progress made to date and areas for focus going forward.

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

We have participated in workshops with our suppliers and partners, such as Residential Aged Care Providers and Recruiters, to ensure we are addressing modern slavery risk from various perspectives.

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.

Annex 1

The following entities within the Zenitas Healthcare group of companies are reporting entities for the purposes of the Act:

- Guardian Alphabet Holdco Pty Ltd
- Guardian Alphabet Midco Pty Ltd
- Guardian Alphabet Pty Ltd
- Zenitas Healthcare Pty Ltd

The wholly owned subsidiaries of Zenitas Healthcare Pty Ltd comprise:

- 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
- 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