



The new face of  + *rdns* 

Bolton Clarke
Modern Slavery Statement
2021



Introduction

Bolton Clarke is an independent public benevolent institution with more than 135 years of experience providing care services for Australia's most vulnerable people and improving health and wellbeing across the broader community.

This longstanding commitment to caring for those most in need is reflected in our organisational heritage and enduring values and underpins our approach to ethical and sustainable procurement practices.

This Statement is submitted as a joint statement in accordance with the *Modern Slavery Act 2018* (Cth). It is submitted by RSL Care RDNS Limited trading as Bolton Clarke on behalf of the Bolton Clarke Group, which during this reporting period comprised RSL Care RDNS Limited, Royal District Nursing Service Limited and RDNS Homecare Limited.

It identifies the steps taken by Bolton Clarke to identify, manage and mitigate the risks of modern slavery occurring in our operations and supply chain.

All Australian entities operate under the same leadership and governance policies and frameworks. A process of consultation across the Australian entities helped to guide the drafting of this statement. This included engagement with the executive leadership team and key stakeholders in legal and risk, procurement, property, information and communications technology.

Acknowledgement of country

Bolton Clarke acknowledges all Aboriginal and Torres Strait Islander Traditional Owners of Country throughout Australia and recognises their connection to land, sea, culture and community.

We pay our respect to Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander Peoples.

About Bolton Clarke

Bolton Clarke is a leading Australian not-for-profit provider of independent living services and senior living options with a core purpose of supporting and enabling health, wellbeing, independence, quality of life and choice for our customers and all older people. Our services are designed with our customers and are focused on keeping people active and well so they can continue to do the things they enjoy.

Our history

The Royal District Nursing Service (then Melbourne District Nursing Society) started in 1885 with a single nurse taking to the streets of Melbourne to tend the sick and poor in their own homes.

Around five decades later RSL Care was founded in Queensland with the purpose of providing accommodation, care and support for ageing ex-servicemen and women.

In 2015, RSL Care and RDNS came together to create a new generation of for-purpose enterprise enriched by a shared heritage of care and a commitment to empowering people and supporting health, independence and dignity. In August 2017, the newly formed group rebranded as Bolton Clarke, honouring early community leaders Lady Janet Clarke and Brigadier William Kinsey Bolton.

Our organisation today

Today we employ more than 6,000 staff who make over 3.9 million client visits each year and support more than 5,000 residents in our retirement living and residential care communities.

The story behind our name

Brigadier William Kinsey Bolton

Brigadier William Kinsey Bolton was an Australian soldier during World War I, serving during the initial battles of the Gallipoli campaign. After his return to Australia he helped found the Returned Sailors and Soldiers League, the forerunner of the RSL, and served as its first national president.

Lady Janet Clarke

Well known philanthropist Lady Janet Clarke was President of the Melbourne District Nursing Society from 1889-1908 and later became a Life Governor.



Our highlights

On the road, in the home and within our retirement and residential communities we have a long history of delivering strong customer outcomes.

Our **25** residential care communities support **2,510+** resident places

12.5 million+ kilometres travelled by our at home support teams

2,500+ residents enjoy living in our **25** retirement villages

3.9 million visits to more than **113,000** clients

Quality and clinical care



Maintained accreditation across our 48 at home support and residential services

Achieved full ARVAS accreditation for all our retirement villages



Provided submissions, expert testimonials, contributed to research and roundtable discussions



Our employees completed 49,000+ online clinical learning courses



Embedded 42 Infection Prevention and Control leads with post graduate qualifications

Innovation and capability



InTouch

2,100 Bolton Clarke InTouch installations helping our clients and village residents stay safe and connected at home



22 peer-reviewed and industry articles published and 29 presentations shared in Australia and overseas by our Research Institute



40+ national and international corporate and research partnerships improving health, independence and quality of life

Supporting communities



6000+ employees and 190+ volunteers



Our clients and residents originate from 187 countries and speak more than 119 languages



More than 25,000 older Australians have accessed our free Be Healthy and Active community education sessions



16 capital works projects providing new living options for customers

Our structure

The Bolton Clarke Group includes RSL Care RDNS Limited, RDNS Homecare Limited and Royal District Nursing Service Limited.

RSL Care RDNS Limited	RDNS Homecare Limited	Royal District Nursing Service Limited
<ul style="list-style-type: none"> • Commonwealth Home Support Programme • Home care • Retirement living <ul style="list-style-type: none"> - Design, develop, commission and operate retirement villages - 1,932 units across 25 villages in QLD and NSW • Residential aged care <ul style="list-style-type: none"> - Design, develop, commission and operate aged care communities - 2,511 beds across 25 aged care communities in QLD and NSW • Respite care • Dementia care • Palliative care • Day therapy centres 	<ul style="list-style-type: none"> • Home nursing • Home assistance • Commonwealth Home Support Programme • Home Care Packages • Hospital liaison services • Home and Community Care Program (under 65) VIC 	<ul style="list-style-type: none"> • Commonwealth Home Support Programme • Home nursing • Specialised nursing • Virtual nursing • In home monitoring • Social connection support • Language interpreter lines • Research Institute • Hospital Admission Risk Program • Transition Care • Restorative and rehabilitation care • HIV / AIDS program • Homeless Persons Program • National pregnancy, birth and baby health line

Dedicated call centre: 7 days a week, 365 days a year

How we work

An independent skills-based Board governs Bolton Clarke's services and care in line with our Strategic Roadmap. A values-driven executive leadership team supports the Board and drives the delivery of high-quality, safe and reliable services for our clients and residents.

Our Group has clearly defined governance practices set out by the Bolton Clarke Board of Directors that adhere to the governance standards and laws of the jurisdictions in which we operate.

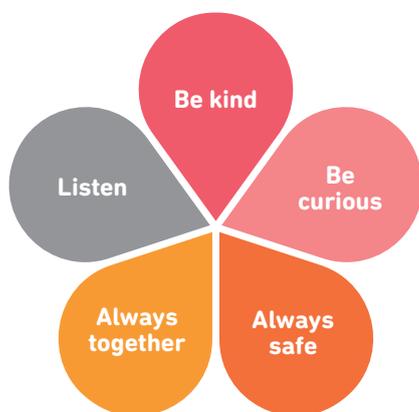
Our values

Caring about our customers' health and wellbeing is at the heart of what we do.

Our purpose and values

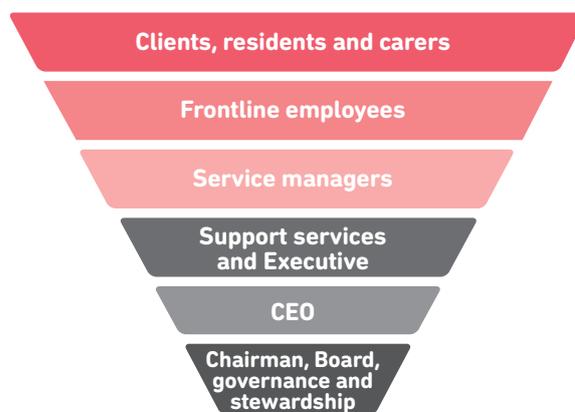
The work we do is driven by our purpose to help people live a life of fulfilment.

Our values are bringing life to our purpose particularly in the current context. They are a reflection of our commitment to our customers and of our every day interactions with each other.



How we operate

The way we operate ensures we actively engage with our customers to develop responsive and supportive services that recognise their unique needs, interests and experiences.



Our customer focus

- Our customers can expect us to:
- Treat them with dignity and respect
 - Understand and respond to their individual needs
 - Act with empathy and integrity
 - Continually improve what we do via insights, research and innovation

Our locations

The Group is headquartered in Brisbane, Queensland and operates domestically across Queensland, New South Wales, Victoria and Tasmania, with an emerging presence in Western Australia.



Residential and Retirement communities

Queensland

- Baycrest, Hervey Bay ●●
- Bicentennial, Mackay ●
- Bongaree, Bribie Island ●
- Breezes, Mackay ●
- Carrington, Parkinson ●●
- Cazna Gardens, Sunnybank Hills ●●
- Centaur Memorial, Caloundra ●
- Chelsea, Maryborough ●●
- Cunningham Villas, Bowen ●
- Farnorha, Cairns ●
- Fairview, Pinjarra Hills ●●
- Fairways, Bundaberg ●●
- Fernhill, Caboolture ●●
- Galleon Gardens, Currumbin Waters ●●
- Glendale, Mount Louisa ●
- Inverpine, Murrumba Downs ●●
- Milford Grange, Ipswich ●●
- Moreton Shores, Thornlands ●●
- Pioneers, Longreach ●●
- Rowes Bay, Townsville ●●

- Sapphire on the Esplanade, Hervey Bay ●
- Sunset Ridge, Rockhampton ●●
- Talbarra, Waterford ●●
- Tantula Rise, Alexandra Headland ●●
- Westhaven, Toowoomba ●●

New South Wales

- Broadwater Gardens, Port Macquarie ●
- Cabrini, Westmead ●
- Darlington, Banora Point ●●
- Macquarie View, Bolton Point ●●
- Winders, Banora Point ●●

Victoria

- Europa on Alma, Melbourne ●

At Home Support

Queensland

- Brisbane
- Caboolture and Redcliffe Peninsula
- Cairns
- Gold Coast
- Ipswich and West Moreton
- Logan
- Mackay
- Rockhampton

- Sunshine Coast and Cooloola
- Toowoomba
- Townsville
- Wide Bay

New South Wales

- Brunswick Heads
- Hunter
- Lismore
- Port Macquarie
- Sydney
- Central Coast
- Illawarra

Victoria

- Geelong
- Greater Melbourne
- Mornington Peninsular

Tasmania

- Hobart

International

- Altura Learning: UK, Ireland, Australia and New Zealand
- RDNS New Zealand
- RDNS Hong Kong

Our supply chains

We purchase goods and services from suppliers in remote, regional and metro areas in Australia as well as international suppliers located across the world in both developed and developing countries. We have established long-term relationships with key strategic suppliers, the overwhelming majority of whom are located in Australia.

We have organised our expenditure into 29 unique spend categories.

We have excluded from our analysis the following expenditure for the following reasons:

- Our capital works expenditure, which will be the subject of a separate expenditure analysis and risk assessment in the FY2021/2022 reporting period; and
- Supply agreements locally managed at a Bolton Clarke site (rather than the procurement team) where expenditure with each supplier is under \$7,500 per annum, most of which are in the home care business stream to our community customers. Our customers who receive care services in their homes often choose their own suppliers, particularly those suppliers with whom they have a pre-existing relationship.

98% of our expenditure is with 963 suppliers.

80% of our expenditure is across the following 9 spend categories:

ICT software, networking and support services	18%
Medical equipment, consumables and supplies	11%
Labour hire	9%
Property and facility maintenance services	8%
Food, catering and hospitality	8%
Professional services and consulting	7%
Aged and homecare support services	7%
Office and building supplies and services	6%
Allied health	6%

Percentages have been rounded to the nearest whole number.

COVID-19 impacts on our operations and supply chains

The Covid-19 pandemic in 2020 had a significant impact on our operations and supply chain.

Our communities and suppliers faced extended lockdowns, rapidly changing health and safety protocols and public health directives to address the evolving pandemic conditions, which resulted in shifts in production, limited distribution and shortages of essential items.

Our commitment to providing care to our residents, community clients, and our teams providing frontline support required a rapid response to sourcing additional medical and consumable items, including PPE. We worked closely with our preferred suppliers to manage and communicate the changing supply chain landscape and established new supply relationships with distributors and suppliers with whom we had not previously engaged. The procurement team set up a triage type approach to identifying and evaluating potential new suppliers, with consideration of country of origin and well known manufacturers and brands taken into account when making these risk based decisions.

Identifying modern slavery risks in our operations and supply chains

Supply chain risk analysis

During the course of the financial year ending 30 June 2021, we engaged a third party modern slavery consultancy service to assist us in assessing the potential risks of modern slavery in our supply chain. With the exception of capital works (which will be assessed in the FY2021/2022 reporting period), and site managed supply agreements where expenditure with each supplier is under \$7,500 per annum, all spend categories were assessed.

Potential risks for modern slavery were determined according to the following indicators based on international and national guidance documentation:

- Geographic location – The country where a good is made or a service is delivered. Whilst we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than our suppliers' Australian locations.
- Commodity/product – The raw materials or components that comprise the good or service.
- Industry – The industry sector involved in the manufacturing or delivering of the good or service.

Supplier risk profile overview

The table below provides an overview of the Bolton Clarke supplier risk profile.

	High risk	Medium risk	Low risk	Total
Spend risk (\$AUD)	53%	31%	16%	
Supplier risk	611	164	188	963
Category risk	15	11	3	29

Our supplier assessment further classified the nine highest spend categories into the respective risk categories.

HIGH RISK – Spend category

Medical equipment, consumables and supplies

Labour hire

Property and facility maintenance

Food, catering and hospitality

Aged care and home care services

MEDIUM RISK – Spend category

ICT software, networking and support services

Utilities, Office and building supplies services

LOW RISK – Spend category

Professional services and consulting

Allied Health services

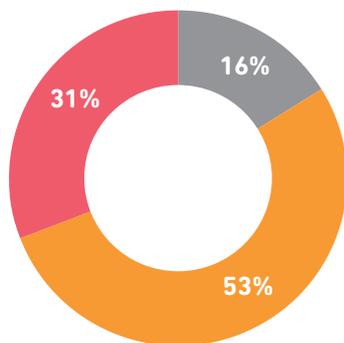
Supplier ranking by spend

In addition, we profiled the potential modern slavery risks of our top 10 suppliers.

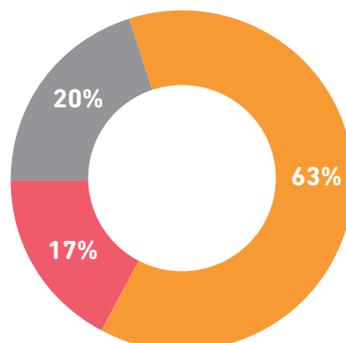
Supplier ranking by spend	Supplier spend category	Supplier risk
1	ICT software, networking and support services	Medium
2	Food, catering and hospitality	High
3	Labour hire	High
4	Utilities, Office and building supplies services	Medium
5	ICT software, networking and support services	Medium
6	Medical equipment, consumables and supplies	High
7	Medical equipment, consumables and supplies	High
8	Property and facility maintenance	High
9	ICT software, networking and support services	Medium
10	Medical equipment, consumables and supplies	High

At a glance

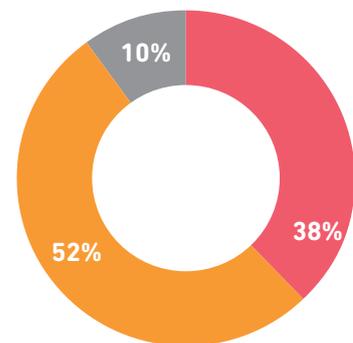
Potential modern slavery risk by expenditure



Potential modern slavery risk by supplier number



Potential modern slavery risk by category numbers



High risk  Medium risk  Low risk 

Actions taken to assess and address modern slavery risks

Our policy framework

We have a comprehensive set of policies that articulate our values, ways of working and expectations of our team and suppliers. This policy framework ensures that our team members and suppliers clearly understand our expectations.

The following policies are those that are most relevant to preventing modern slavery among our team members and workers in our supply chains:

Policy	Purpose
Modern Slavery Standard	Outlines our stance and expectations of suppliers, contractors and business partners in relation to our Modern Slavery obligations at the outset of the business relationship and reinforced thereafter
Supplier Code of Conduct	Explicitly sets out our expectations of suppliers to allow Bolton Clarke to meet its own stringent requirements for ethical conduct and supplements the contractual arrangement between both parties
Whistleblower Policy	Outlines the available avenues for workers, suppliers, contractors and their family to report or disclose any concerns they may have relating to reportable misconduct
Code of Conduct	Provides workers with a clear understanding of the standard of conduct expected when performing work as a Bolton Clarke employee
Equity, Diversity, Bullying, Harassment and Anti-Discrimination Standard	Articulates our commitment to equal opportunity and aims to ensure our workplace is free from unlawful discrimination, harassment and vilification and fosters safety, fairness, equity and respect for diversity
Fraud Control Plan, including Fraud Control Policy and Fraud Control Standard	Sets out examples of fraud and corruption to allow our team to recognise and take proactive steps to prevent these risks and establishes the appropriate pathways for reporting and investigation.
Enterprise Agreements	Our two Enterprise Agreements set out the terms of employment and remuneration which apply to a majority of our health and aged care workforce
Health, Safety and Wellbeing Policy	Supports behaviours and practices associated with high performance in workplace safety and wellbeing
Workplace Complaints Standard	Reiterates and implements our Group's commitment to providing a fair, equitable, safe and productive work environment for workers and the timely and equitable resolution of workplace complaints
Recruitment and Selection Standard	Sets out our merit-based, equity and diversity-promoting and fair and transparent recruitment and selection process

Relevant anti-modern slavery extracts from our Supplier Code of Conduct

In our Modern Slavery Statement for FY2019/2020, we reported on the introduction of our Supplier Code of Conduct which sets out our expectations of our suppliers, their subsidiaries, subcontractors and supply chains. We have continued to reinforce to our suppliers our stringent requirements for ethical conduct. These include:

Element	Expectation
Workplace culture	Foster a workplace culture free from workplace bullying, harassment, victimisation and abuse. This includes, but is not limited to, verbal, physical, sexual or psychological abuse and harassment
Proactively address human rights obligations in your supply chain	Provide goods and services in a manner consistent with any applicable human rights obligations. Consistent with Commonwealth modern slavery legislation, we expect you to proactively identify and address modern slavery risks and maintain responsible and transparent supply chains. Modern slavery is defined broadly to include all forms of human trafficking, slavery like practices such as forced labour and debt bondage
Use of temporary and outsourced labour	Use temporary and outsourced labour within the limits of the law. You are therefore expected to use all reasonable endeavours to ensure that the third-party recruitment agencies you engage are compliant with the provisions of this Code of Conduct and applicable law. You are also responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third party agencies
Legislated entitlements	Ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays. You must pay workers' wages as required under applicable laws in a timely manner and not use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws
Grievance practices	Ensure that policies and practices are in place to allow violations, misconduct or grievances to be reported by workers without fear of victimisation or detrimental conduct
Self assess compliance	Proactively self-assess compliance with this Code of Conduct, take action to remedy any shortcomings and advise your key contact at Bolton Clarke of any non-compliance, as well as any improvement actions and plans
Procurement practices	Ensure adequate procurement processes are in place over your own supply chain to assess, select and execute supplier arrangements that meet this Code of Conduct

Strengthening our supplier contracts

In our Modern Slavery Statement for FY2019/2020, we reported on the introduction of specific modern slavery provisions into the terms and conditions of our template contracts used across our business. The continued use of the modern slavery provisions in our template contracts has initiated conversations with our suppliers, both existing and new, about modern slavery risks and our expectations for mitigating and remediating those risks.

Where we propose to contract on our supplier's terms, we have negotiated amendments to those standard terms in order to incorporate our specific modern slavery clauses.

Modern slavery clauses extracted from our template supply agreement for the purchase of goods and/or services:

1.1 The Supplier and the Supplier's Associates must:

- (a) comply with the Modern Slavery Laws, the Supplier Code of Conduct and any policies, procedures, standards and guidelines developed by Bolton Clarke from time to time for the purpose of complying with the Modern Slavery Laws; and
- (b) not engage in any activity, practice or conduct which may constitute Modern Slavery.

1.2 The Supplier must:

- (a) comply with all reasonable directions of Bolton Clarke, and otherwise provide all assistance, records and information and do all things necessary to assist Bolton Clarke to comply with its obligations under the Modern Slavery Laws, including:
 - (i) promptly and truthfully complete periodic questionnaires in relation to the Supplier's labour practices, supply chain and operations as requested by Bolton Clarke; and
 - (ii) permit Bolton Clarke to conduct audits and grant such access to the Supplier's records, premises, computer systems, equipment and other property as reasonably required by Bolton Clarke to verify the Supplier's compliance with the terms of this clause 1.
- (b) maintain records sufficient to trace the supply chain of all goods and services provided to the Supplier by a third party;
- (c) develop and implement policies and procedures to screen, identify, prioritise, respond and remediate Modern Slavery or the risks thereof in the Supplier's supply chains and operations; and
- (d) ensure that any subcontractor is engaged under a subcontract which reproduces the Supplier's obligations (reframed as the subcontractor's obligations) as are contained in this clause 1.

1.3 The Supplier represents and warrants that any records and information provided by the Supplier to Bolton Clarke for the purpose of assisting Bolton Clarke to comply with its obligations under the Modern Slavery Laws are true and accurate and may be used and relied upon by Bolton Clarke for the purposes of the Modern Slavery Laws.

1.4 The Supplier will:

- (a) notify Bolton Clarke of actual or reasonably suspected conduct in the Supplier's supply chain or operations which constitutes Modern Slavery or presents a high risk of Modern Slavery occurring with respect to the goods and services provided to the Supplier ("identified conduct"), within a reasonable period of time after the Supplier becomes aware of the identified conduct;
- (b) at its own cost, take all reasonable steps to investigate, respond and remediate the identified conduct; and
- (c) keep Bolton Clarke informed as to the actions taken by the Supplier and the effectiveness of those actions in remediating the identified conduct.

1.5 The Supplier's obligations contained within this clause 1 constitute essential terms of this agreement. Breach of any of these terms by the Supplier will constitute a material breach of this agreement

Similarly, our Purchase Order Terms and Conditions includes the modern slavery clauses and requires suppliers to acknowledge that they have read, understood and agree to our Terms and Conditions, including the Supplier Code of Conduct.

Integration of modern slavery provisions into existing contracts

We have focused on varying existing contractual terms for our suppliers with an annual expenditure greater than \$50,000 which, given the nature of the good or service supplied, present an elevated potential modern slavery risk. We have sought the cooperation of those suppliers to vary the existing contractual terms during the term of their respective contracts.

Due diligence process for supplier selection and screening as part of tender process, including consideration of modern slavery risks

Our standard tenders include a section explaining what modern slavery is and the requirements of the *Modern Slavery Act 2018* (Cth). We then ask questions to understand the supplier's approach to modern slavery risk in their supply chains, their policies, practices and actions taken as well as their planned actions.

We include modern slavery awareness and remediation actions as a criterion in our tender evaluations and score suppliers on their provided responses.

Educating our workforce

As part of our work with the third party modern slavery consultancy service during the financial year ending 30 June 2021, we commissioned the development of a comprehensive modern slavery training package for our employees. We have initially focused on rolling these out to our procurement and legal teams given their involvement in supplier selection and onboarding. The training package comprises the following modules:

Introduction to Modern Slavery

- Defining modern slavery
- Who is vulnerable
- Forms of modern slavery
- Numbers of people in modern slavery globally and in Australia

Potential Risk of Modern Slavery in the Workplace

- The continuum of worker exploitation
- Factors that lead to increased vulnerability
- Types of high-risk jobs or workplaces

Exploring the Key Indicators for Modern Slavery in Supply Chains

- Supply chain risks
- Red flags for modern slavery

Importing Risk

- Forms of modern slavery found in Australia
- Industry sectors and types of jobs at risk of modern slavery
- Types of high risk goods imported into Australia

Business Relevance

- Defining the why of human rights
- Business's impact on human rights
- The business drivers to spur management of the risk

Modern Slavery Legislation

- History of slavery and human rights
- Current forms of modern slavery
- Overview of legislation requirements in different countries
- Details of what is included in the Australian Modern Slavery Act
- Modern Slavery reporting requirements

Encouraging and empowering the reporting of modern slavery risks

We are committed to fostering an open and supportive culture where everyone is encouraged and empowered to raise any concerns regarding actual or suspected unethical, unlawful or undesirable conduct without fear or detriment. We have made available within our organisation and on our website our comprehensive Whistleblower Policy written in Q&A style.

Reportable misconduct which may be reported under our Whistleblower Policy includes actual or suspected conduct in our supply chain or operations which constitute modern slavery or presents a high risk of modern slavery occurring.

A disclosure may be made under our Whistleblower Policy

1. Internally, by reporting to an officer or senior manager of Bolton Clarke;
2. To our independent whistleblower service provider, Your Call; or
3. To external authorities and entities.

We review our Whistleblower Policy every two years or when there are changes to the legislative or our operating environment. We last reviewed our Whistleblower Policy in June 2021.

We are continually working to improve awareness of our Whistleblower Policy with our workers, suppliers and contractors.

Assessing the effectiveness of our actions

Number of supplier contracts that include modern slavery clauses

The table below indicates the number of new supplier contracts, by business unit, that have included the new modern slavery clauses. We have commenced working with high risk suppliers in respect of high risk agreements which were due for renewal or renegotiation by varying the existing terms of those agreements to include modern slavery clauses. This program of work is continuing as agreements fall due for renewal over the next 12 months.

This measurement excludes locally managed supplier contracts with an annual expenditure of less than \$50,000, which are on standard terms and already incorporate our modern slavery clauses.

The graph below indicates the percentage of contracts by business area that contain the modern slavery clause, along with those that have the modern slavery clause included via a contract variation.



Number of tender responses which include consideration of modern slavery risks

Out of all tenders issued by our procurement team, 73% of all respondents included consideration of modern slavery risks. Responses varied considerably in their understanding of modern slavery and their actions both undertaken and planned, with small suppliers generally either just beginning the journey or not yet started. By comparison, most large organisations, and particularly those that are global, were found to be much more advanced.

Number of internal modern slavery training modules completed

In the financial year ending 30 June 2021, our legal and procurement teams completed 66 modern slavery training modules.

Looking forward - our focus in FY2021/2022

Element	Action	Risk Status
Training	In the FY2021/22 reporting period, we intend to roll out the modern slavery training packages to Bolton Clarke's Executive team, Board Members and key purchasing decision makers/ managers in ICT, Property, Operations, Hotel Services and People and Culture.	Medium
Supplier engagement	Modern slavery engagement discussions to continue with suppliers to improve their understanding and knowledge of our expectations and practical application of modern slavery risk assessments. This is particularly required for those suppliers that fall below the reporting threshold and may otherwise be unaware of the potential modern slavery risks within their extended supply chain.	Medium
Due diligence	Increasing due diligence and risk assessment in supplier selection and supplier management programs via continued integration of modern slavery clauses into existing agreements, contract variations and contract renewals and updating supplier selection and evaluation practices to reflect modern slavery requirements.	Medium
Supplier questionnaire	A supplier self-assessment questionnaire will be developed and utilised for a more in-depth supplier review of highest risk suppliers and will inform us of the elements requiring a higher level of investigation.	Medium
Review of modern slavery risk within highest risk suppliers	We will be utilising the services of a third-party subject matter expert to conduct a deeper dive into the highest risk suppliers – specifically for food, medical consumables and labour hire.	Medium
Supplier segmentation framework	We will commence development of a Supplier Segmentation Framework to be used in conjunction with supplier assessments for a more detailed understanding of the Modern Slavery risk within our supply chain.	High

This Modern Slavery Statement was approved by the RSL Care RDNS Limited Board on 25 November, 2021



Pat McIntosh AM CSC
Chairman



The new face of  + 

At Home Support Retirement Living Residential Aged Care

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Bolton Clarke is the brand name for a group of companies being RSL Care RDNS Limited ABN 90 010 488 454, Royal District Nursing Service Limited ABN 49 052 188 717 and RDNS HomeCare Limited ABN 13 152 438 152