

Addressing Modern Slavery

The steps we're taking to reduce risks and initiate improvements within our business and supply chains

In accordance with the Federal Government's *Modern Slavery Act 2018*, this statement outlines the steps taken during FY 20 to assess and address modern slavery risks within RSL Care RDNS Limited and Royal District Nursing Service Limited and our supply chains, and our plans for review and improvement.

What we do

RSL Care RDNS Limited and Royal District Nursing Service Limited are members of the Bolton Clarke Group which has over 6,300 employees. Bolton Clarke is one of the largest Australian owned and operated not-for profit healthcare and independent living service providers in Australia.

Our position on modern slavery

Defined as exploitative practices that violate an individual's dignity and human rights including human trafficking, servitude, forced labour, debt bondage, and wage theft, all forms of modern slavery are serious crimes under Australian law.

Bolton Clarke rejects any form of modern slavery and we are committed to implementing and enforcing effective systems and controls to ensure it does not take place within our own business nor our supply chains. Wherever we operate, we respect the human rights of our employees and clients, and of the employees and contractors of our suppliers and business partners, and we aim to identify and manage any risks related to these rights. Working together, RSL Care RDNS Limited

and Royal District Nursing Service Limited have take the action described in this statement.

Our workplace

We are committed to complying with relevant local and national laws related to human rights and modern slavery. As part of Bolton Clarke's commitment to treating people with respect and dignity, we do not tolerate any form of discrimination or harassment and we strive to be an equal opportunity employer.

We are committed to ensuring our employment conditions comply with all industrial relations requirements and sustain the health, safety and wellbeing of our employees. We are also committed to creating and maintaining both a diverse workforce and an inclusive and safe workplace for all.

Measuring and managing our workplace risks

Bolton Clarke has commenced the process of monitoring and reviewing our own quality and risk frameworks, policies, systems and processes. We are dedicating resources to measure, manage and eliminate any human rights violations in our workplaces through:

- Policies and governance – our Board practices strong corporate governance to ensure that all decisions and actions are based on transparency, integrity,

responsibility and performance for long-term sustainability.

- Ethics and conduct – we recognise that our employees and contractors must maintain a compliant and ethical approach to business practices, and we are committed to dealing honestly and fairly with our clients and to managing the risk of unfair client outcomes.

Measuring and managing our supply chain risks

We recognise that being in the health and aged care 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, in particular the use of temporary outsourced staff, as well as in the manufacture of health and aged care products and equipment. We are also conscious of the Covid-19 pandemic and its effect on supply chains. For example, in early 2020 Bolton Clarke had to quickly establish additional supply chains to source additional personal protective equipment for its employees.

Bolton Clarke also has a large capital works program and we recognise the modern slavery risks that arise from the manufacture of construction materials and plant and equipment.

Bolton Clarke is committed to measuring, managing and eliminating any human rights violations in our supply chain through:

- Our standard terms and conditions of purchase and template contracts for the supply of goods and services

and construction related activities require suppliers (and in turn their own supply chains) to comply with the *Modern Slavery Act* and to notify us immediately of any actual or suspected breach of the Act so that we are able to determine an appropriate course of action. We are also entitled to conduct audits of our suppliers to assess their compliance with the Act and their practices to reduce modern slavery risks;

- Our Modern Slavery Standard sets out the actions and behaviours we expect of suppliers in being aware of, addressing, and being open with us about, instances of modern slavery and human trafficking within their own business and supply chains.
- Our Supplier Code of Conduct makes clear our expectation that suppliers, subcontractors and their respective supply chains comply with all applicable legislation. This commitment includes, but is not limited to, an obligation for our suppliers to comply with the *Modern Slavery Act*, proactively identify and address modern slavery risks, maintain responsible and transparent supply chains and report on their compliance to Bolton Clarke.
- Risk management and due diligence – strengthening our existing procurement framework governing supplier arrangements and managing commercial risk, although Bolton Clarke has experienced significant changes to

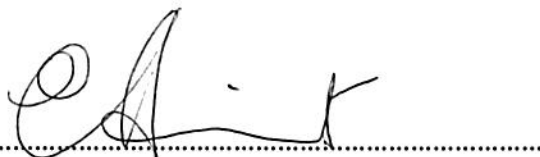
its supply chains in light of the Covid-19 pandemic and its effect on the health and aged care sector.

How we're planning ahead

We intend to strengthen our understanding of the modern slavery issues within our business and our supply chains and our ability to assess the effectiveness of the actions we take to address modern slavery risks. Our key areas of focus are:

- Analysing and understanding our supply chain more deeply and exploring options to work with suppliers and partners on an increasingly collaborative basis;
- Improving due diligence processes for supplier selection and screening to include consideration of modern slavery risks;
- Commencing a review of first-tier suppliers assessed as having an elevated risk of human rights violations; and
- Mapping supply chains.

This Modern Slavery Statement was approved by the RSL Care RDNS Limited Board on 26 November 2020



Dr. Cherrell Hirst

Director

