



ST VINCENT'S
Better and fairer care. Always.

UNDER THE STEWARDSHIP OF MARY AIKENHEAD MINISTRIES



4th Modern Slavery Statement

1 January 2023 - 31 December 2023

Disclosure

This is a joint statement made on behalf of St Vincent's and covers the following entities it owns or controls:

St Vincent's Health Australia Ltd
ABN 75 073 503 536

on its own behalf and on behalf of the following subsidiary or affiliated entities:

St Vincent's Hospital Sydney Limited
ABN 77 054 038 872

St Vincent's Hospital (Melbourne) Limited
ABN 22 052 110 755

St Vincent's Private Hospitals Ltd
ABN 61 083 645 505

***St Vincent's Private Hospital Sydney**
ABN 99 269 630 262

St Vincent's Care Services Ltd
ABN 50 055 210 378

St Vincent's Healthcare Ltd
ABN 46 095 382 791

St Vincent's Care Services Boondall Ltd
ABN 15 146 972 303

St Vincent's Care Services Carseldine Ltd
ABN 49 094 645 262

St Vincent's Community Health Ltd
ABN 36 054 594 375

*affiliated entity



Reconciliation: Towards excellent health, happiness and equality, 2016
Bianca Beeton, Vicki Couzens and Jeffery Samuels in collaboration with 48 SVHA staff members

Better and
fairer care.
Always.



St Vincent's recognises the Traditional Custodians of the land on which its many sites are located. We pay our respects to Elders past and present and welcome all Aboriginal and/or Torres Strait Islander people to our places of care.

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A message from our Chair

Mr Paul McClintock AO

The Board of St Vincent's regards our organisation's anti-slavery endeavours as fundamental to our mission and legacy. We are committed to pursuing the elimination of modern slavery within health and aged care while supporting victims and helping them reclaim their dignity and thrive.

Our fourth St Vincent's Modern Slavery Statement provides an update on our efforts over the past 12 months. Continuing our journey from the past few years, we have revisited our risk assessment framework, processes, and protocols. Unsurprisingly, given the complexity of the challenges we face in anti-slavery, we have uncovered additional high-risk areas within our operations that we need to investigate in the period ahead.

Navigating supply chain risks with high-risk suppliers that are unwilling to adopt our preferred risk assessment has been challenging. To address this, we have initiated a supplier 'due diligence program' to foster direct communication, enhance visibility and transparency, and have offered them a tailored platform to discuss their challenges and mitigate risks. We have begun the rollout of this program with a select group of suppliers with the goal of extending it to all those companies identified by our risk identification framework within the next two to three years.

We advanced our partnership with the Australian Catholic Anti-Slavery Network (ACAN) and established a working group of Catholic healthcare organisations to encourage a collaborative effort in tackling modern slavery

across our supply chains. We have similarly worked closely with the Australian Catholic Religious Against Trafficking Humans (ACRATH), which has been instrumental in advocating for modern slavery legislation in Australia and aiding us in setting up essential protocols for survivor assessment.

Finally, we recognise that our frontline staff are among the select few who interact with the survivors of modern slavery. Prioritising their awareness and training in areas relevant to their roles has been a key focus, and we aim to bolster this effort in the upcoming reporting period. We extend our appreciation to the Anti-slavery Commissioner for NSW for generously providing resources and supporting our initiatives to train our staff, as well as taking the lead in establishing a health sector-specific anti-slavery community of practice.

Our commitment at St Vincent's to combating modern slavery reflects our core values. In collaboration with our stakeholders, we strive to raise awareness and play our part in eradicating this global problem.

A handwritten signature in black ink, appearing to read 'P. McClintock'.

Mr Paul McClintock AO
Board Chair

This Modern Slavery Statement was approved by the principal governing body of St Vincent's as defined by the Modern Slavery Act 2018 (Cth) ("the Act") and was approved on 6 June 2024.

This Modern Slavery Statement is signed by a responsible member of St Vincent's Health Australia Ltd as defined by the Act.

About St Vincent's

The history of Australian health and aged care is long and distinguished. Tracing things back to the start, you'll find a chapter dedicated to five courageous and compassionate women, 'the Sisters of Charity' - the founders of St Vincent's.

Arriving in Australia in 1838 – with a commitment to care for people who were marginalised and disadvantaged – the Sisters of Charity opened the first St Vincent's Hospital in NSW in 1857, followed soon by hospitals in Victoria and Queensland in partnership with governments and the Australian public. From that day, their spirit – human compassion combined with clinical excellence – has been the foundation of all that St Vincent's does.

St Vincent's today is a unique not-for-profit social enterprise with a mix of public and private hospitals, cutting edge clinical research, virtual and home care, aged and palliative services, and community programs.

Our hospitals are major referral centres for rural and regional communities; we provide specialised emergency and trauma services in inner-city Sydney and Melbourne, along with smaller EDs in metropolitan and regional centres; and we are known for our

surgical capacity in all three states providing world-class services in heart transplantation, orthopaedics, neurosurgery, cardiothoracics and cancer care.

Our integrated health innovation precincts in Sydney and Melbourne house globally-renowned medical institutes, all founded by St Vincent's, including the Victor Chang Cardiac Research Institute, the Garvan Medical Research Institute, the St Vincent's Institute of Medical Research, the Aikenhead Centre for Medical Discovery, the St Vincent's Centre for Applied Medical Research, and the Nursing Research Institute.

Underpinning everything we do is our commitment to serving people and communities who are at-risk of poor health outcomes.

The vision, commitment and inspiration of our founder, Mary Aikenhead, and the Sisters of Charity live on in us and the work we do.

**The parent company of the group is
St Vincent's Health Australia Ltd ABN 75 073 503 536.**

**The following are wholly owned subsidiaries of
St Vincent's Health Australia Ltd:**

- St Vincent's Hospital Sydney Limited
- St Vincent's Hospital (Melbourne) Limited
- St Vincent's Private Hospitals Ltd
- St Vincent's Care Services Ltd
- St Vincent's Community Health Ltd
- St Vincent's Healthcare Ltd

**The following are wholly owned subsidiaries of
St Vincent's Care Services Ltd:**

- St Vincent's Care Services Boondall Ltd
- St Vincent's Care Services Carseldine Ltd

The following is an affiliated hospital:

- St Vincent's Private Hospital Sydney

St Vincent's annual revenue for the financial year 2022-2023 can be noted at the [ACNC Register](#).

Our Mission, Vision and Values

Our Mission

As a Catholic healthcare service, St Vincent's brings God's love to those in need through the healing ministry of Jesus.

Our founders – the Sisters of Charity – gave St Vincent's a mission: to provide care, first and foremost, to the most disadvantaged and marginalised members of our community. We welcome all people to our care.

The courage and compassion of the Sisters has been a hallmark of St Vincent's since we began and has been at the heart of many of our proudest achievements, including opening Australia's first program for treating and studying alcohol dependence, establishing Australia's first methadone clinic, the first needle exchange, first HIV/AIDS ward, first palliative care service and first homeless health residential unit.

Today St Vincent's is a leading provider of services to people experiencing homelessness, people with alcohol and other drug dependence, people living with mental illness, First Nations peoples, and people in correctional facilities, proudly continuing the legacy of the Sisters of Charity.

Our Vision

Our vision at St Vincent's is that every person, whoever and wherever they are, is served with excellent and compassionate care, by a better and fairer health and aged care system.

Our 30,000 exceptional and dedicated staff together lead St Vincent's to deliver three key priorities:



Enhance Impact:

Continuously improve our care, enhancing our positive impacts for patients, people, and our planet.



Connect Care:

Work together, building "One St Vincent's" capabilities and services to create the future of connected health and aged care.



Transform the System:

Work with partners to shape a better and fairer health and aged care system.



Our Values

We deliver person-centred care, inspired by the Sisters of Charity, and underpinned by the values of:



Compassion

Our care is an act of love. We are present to and accompany people as they are, and as they need.



Integrity

Our actions and decisions are transparent and aligned with our values.



Justice

Our pursuit of what is right and just empowers us to speak and act with courage on behalf of those in need.



Excellence

Our services are safe and evidence-based, and we continually seek to improve in everything we do.

Our structure, operations and supply chains

Our Structure

St Vincent's is a group of not-for-profit non-listed entities. St Vincent's Health Australia is a public company limited by guarantee and is registered with the Australian Charities and Not-for-profits Commission.

St Vincent's is governed by a Board of Directors ("Board"). The Board exists to ensure there is effective integration and growth of the mission of Mary Aikenhead Ministries throughout the health and aged care services and to govern the St Vincent's group of companies pursuant to the Australian Charities and Not-for-profits Commission Act 2012 (Cth), canon law, and all other relevant civil legislation. The Board must at all times operate within the Mary Aikenhead Ministries Ethical Framework and the Catholic Health Australia Code of Ethical Standards of Health and Aged Care Services in Australia (2001).

The day-to-day running of St Vincent's is the responsibility of the Executive Leadership Team led by the Group Chief Executive Officer.

Board of Directors

The Board is accountable for its key purpose to The Trustees of Mary Aikenhead Ministries ('TMAM'). Mary Aikenhead Ministries builds on the charism and traditions of the Sisters of Charity and Mary Aikenhead, founder of the Sisters of Charity. The Trustees are the canon law and civil stewards of SVHA. All Directors serve as independent non-Executive Directors and are appointed by TMAM.

Board Committees

All Board Committees operate under their own Charter which is approved by the Board. Committees are permitted to appoint external experts to assist them in their consideration of matters.

The Board is supported by seven standing Committees: Audit & Risk; Finance & Investment; Mission, Ethics & Advocacy; People & Culture; Clinical Governance & Experience; Research & Education; and Aged Care.

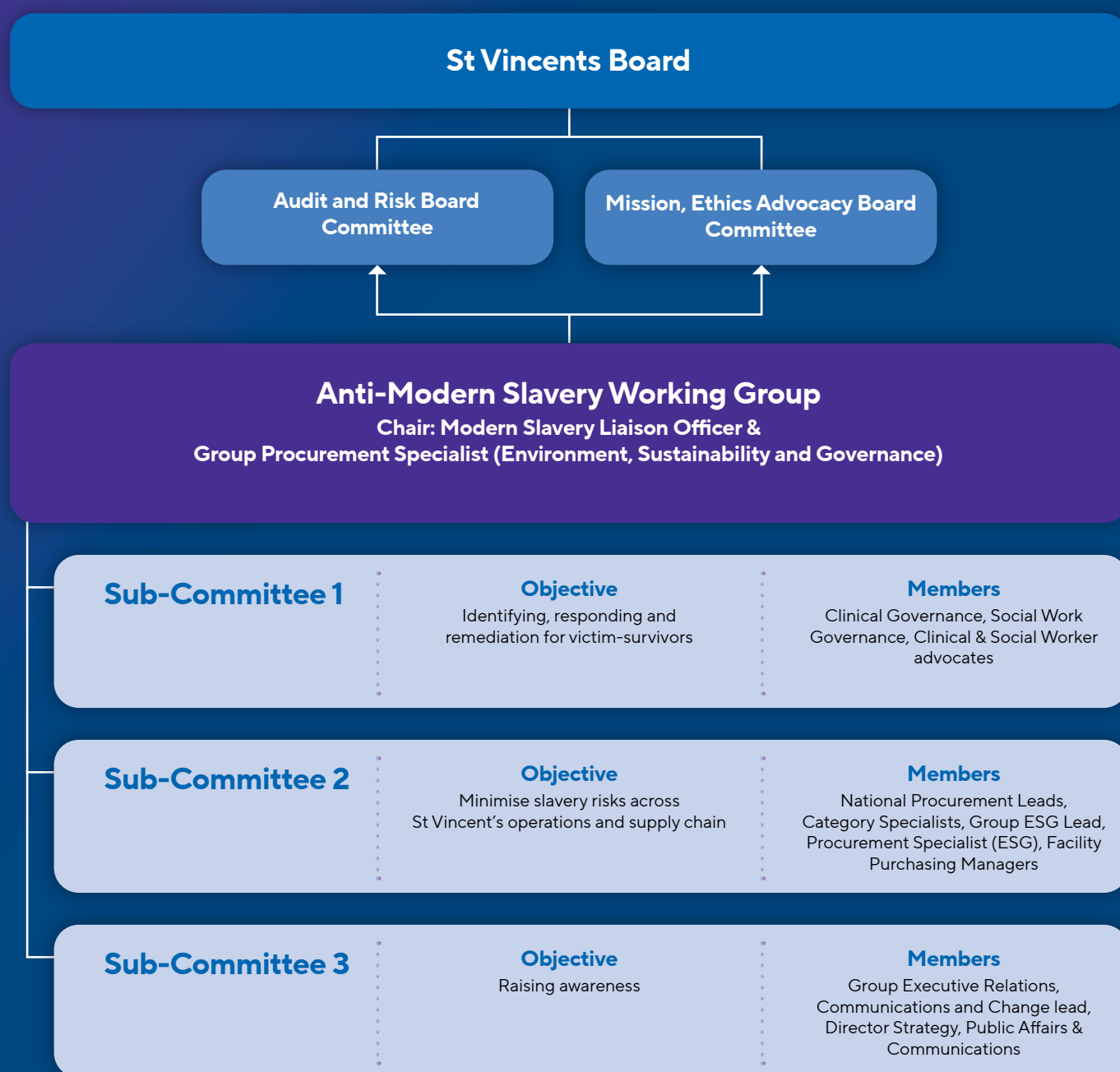
The St Vincent's Modern Slavery governance framework

The Anti-Modern Slavery Working Group (MSWG) at St Vincent's is convened by our Modern Slavery Liaison Officer, a dedicated resource focused on anti-modern slavery efforts across the organisation's operations and supply chain, including the risk framework and mitigation activities.

Due to the alignment with our Mission, MSWG is sponsored by our St Vincent's Group Mission Leader who advocates this work to the organisation's Mission, Ethics and Advocacy Board Committee. The MSWG is also sponsored by our Group Chief Financial Officer for the governance of risks across the supply chain and operations, who then sponsors the Modern Slavery

Report to the Board Audit and Risk Committee, and subsequently to the full St Vincent's Board.

The Anti-Modern Slavery Working Group convenes bimonthly via its sub-committees to effectively manage risks throughout the organisation. The structure of the St Vincent's MSWG is outlined below.



Overview of our divisions



Queensland

Our private hospitals

- St Vincent's Private Hospital Northside
- St Vincent's Private Hospital, Brisbane
- St Vincent's Private Hospital, Toowoomba

Our care services

- St Vincent's Care Bardon
- St Vincent's Care Boondall
- St Vincent's Care Carina
- St Vincent's Care Carseldine
- St Vincent's Care Corinda
- St Vincent's Care Kangaroo Point
- St Vincent's Care Mitchelton
- St Vincent's Care Toowoomba
- St Vincent's Care Southport
- St Vincent's Care Arundel
- St Vincent's Care Maroochydore
- St Vincent's Care Gympie
- St Vincent's Care Douglas (Townsville)



New South Wales

Our public health hospitals and services

- St Vincent's Hospital Sydney
- Sacred Heart Health Service
- St Vincent's Correctional Health Parklea

Our private hospitals

- Mater Hospital, North Sydney
- St Vincent's Private Hospital, Sydney
- St Vincent's Private Community Hospital, Griffith
- St Vincent's Clinic

Our care services

- St Vincent's Care Haberfield
- St Vincent's Care Heathcote
- St Vincent's Care Auburn
- St Vincent's Care Bronte
- St Vincent's Care Edgecliff
- St Vincent's Care Yennora



Victoria

Our public health hospitals and services

- St Vincent's Hospital Melbourne
- St Vincent's on the Park
- Caritas Christi
- St George's Health Service

Our private hospitals

- St Vincent's Private Hospital, East Melbourne
- St Vincent's Private Hospital, Fitzroy
- St Vincent's Private Hospital, Kew
- St Vincent's Private Hospital, Werribee

Our care services

- St Vincent's Care Hawthorn
- St Vincent's Care Kew
- St Vincent's Care Eltham
- St Vincent's Care Werribee
- Berengarra
- Auburn House
- Prague House



National

Our national services

- Hospital in the Home (HITH)
- Residential In-reach Program
- GEM@Home
- Cancer@Home
- Pallcare@Home
- Rehab@Home
- Transition Care Program
- Domiciliary Allied Health
- Community Nursing and Post Acute Care
- Home Care Packages
- Telehealth and telemedicine
- THIS WAY UP
- HealthMonitor
- Commonwealth Home Support Program

Our operations

St Vincent’s is a unique not-for-profit social enterprise that operates two major inner-city health networks in Melbourne and Sydney, 10 private hospitals, 26 aged care facilities – with more than 5,500 hospital and residential aged care beds – and a range of virtual and home care options across NSW, Victoria and Queensland.

We have a team of close to 30,000 dedicated and talented team members and 1,000 volunteers working in their areas of expertise, from regional Queensland to Melbourne’s western suburbs.

Our reach means St Vincent’s has more than one million contacts with patients and residents – including 300,000 admissions, 132,000 Emergency Department presentations, and close to 200,000 in-home care interactions – annually.

Our integrated health innovation precincts in Sydney and Melbourne house globally-renowned medical institutes, all founded by St Vincent’s, including the Victor Chang Cardiac Research Institute, the Garvan Medical Research Institute, the St Vincent’s Institute of Medical Research, the Aikenhead Centre for Medical Discovery, the St Vincent’s Centre for Applied Medical Research, and the Nursing Research Institute. Across our hospitals and co-located institutes, the St Vincent’s research footprint is one of the biggest in Australia with 2,500 researchers and 3,000 annual publications.

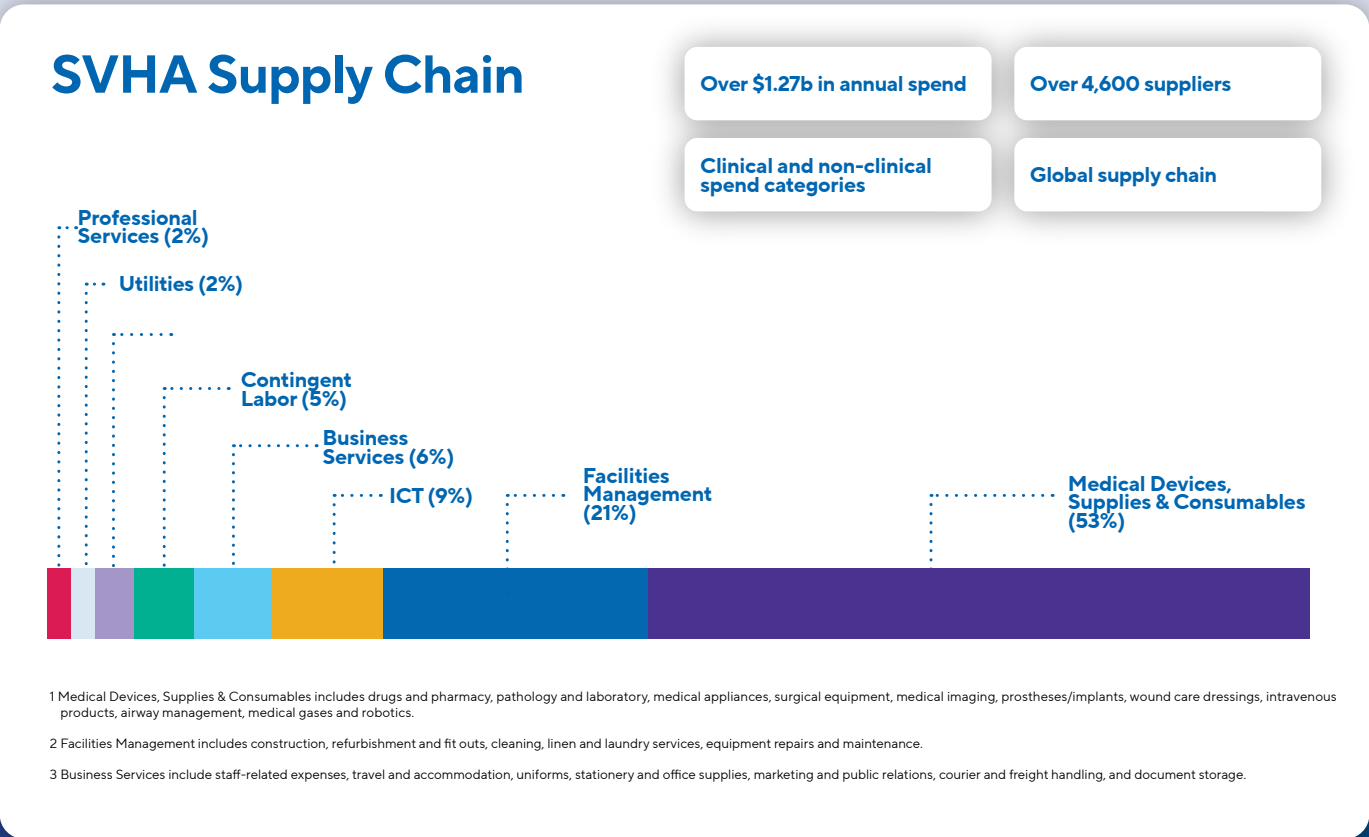
Our supply chain

St Vincent’s has a diverse and complex global supply chain. Our largest suppliers operate throughout the Asia-Pacific region, South Asia, Northern, Southern and Central America, Europe and Australia. We source over \$1.28 billion per annum in clinical and non-clinical goods and services from over 4,600 suppliers.

Our clinical supply chain comprises general medical and surgical consumables, drugs and pharmacy, pathology and laboratory, medical devices, medical imaging, surgical equipment and prostheses/implants, wound care dressings, intravenous products, airway management, medical gases and robotics. Our non-clinical supply chain encompasses ICT, construction, facilities maintenance, cleaning, food and beverage, linen and laundry services, uniforms and equipment, servicing and repairs, contingent labour, as well as corporate overheads such as office supplies and travel.

A centrally-led procurement team, Group Procurement Services, oversees all St Vincent’s procurement and supply chain activities, including the contractual arrangements which cover clinical and non-clinical categories across the organisation. Group Procurement also manage the catalogue of material goods holding over 120,000 material items. Individual facilities are responsible for supply chain teams to manage the day-to-day purchasing and supply at a local level.

The supply chain is underpinned by over 820 formal commercial contracts.



Criterion 3

Identification of modern slavery risks in our operations and supply chain

In the previous reporting period, we established a comprehensive reporting framework to provide reliable data on our category spending and suppliers. By leveraging this framework we refine our approach for detecting modern slavery risks across our supply chain and operations.

The spend categories linked to the procurement of goods or services from external suppliers are identified as supply chain risks. Operational risks pertain to our internal operations, such as in-house cleaning services. However, in many categories where delivery involves both internal and external resources, a clear distinction is not always applicable.

Breakdown of risks across St Vincent's

A Supply Chain

Eight categories within the spend taxonomy are exclusively associated to external suppliers.



1. Medical devices, supplies and consumables (76%)

Our clinical supply chain constitutes the most significant high-risk category, accounting for over three-quarters of our total supply chain risks. It encompasses a complex array of areas, including various sub-categories such as medical devices and equipment, like surgical instruments; medical supplies, like gloves and personal protective equipment (PPE); and consumables, like drugs and pharmaceuticals. Most of our suppliers are large multinational corporations with extensive global supply chains, including facilities in several high-risk countries



5. ICT hardware and printers (1%)



6. ICT phones and communications (1%)

Our ICT suppliers are large national and global suppliers with their supply chains tracing to South-East Asian countries – such as Malaysia, China, Vietnam, Thailand and India – that are relatively less regulated in relation to modern slavery laws and known for the prevalence of modern slavery practices such as forced labour and debt bondage. Our products also include lithium batteries with potential linkages to mining (cobalt) activities in the Democratic Republic of Congo and refining and subsequent production practices in China.

Breakdown of risks across St Vincent's (cont.)

A Supply Chain

Eight categories within the spend taxonomy are exclusively associated to external suppliers.



2. Property and construction (14%)

Refurbishment and construction fall into a high-risk category within our supply chain, sourced from major national suppliers. The construction industry employs a significant number of temporary migrant workers, often contracted through labour hire companies, leading to a heightened risk of worker exploitation and modern slavery. This is due to factors such as reliance on low-paid, seasonal, and temporary labour; recruitment of vulnerable individuals like new migrants and temporary work visa holders; employment of undocumented workers; deceptive practices that trap workers in exploitative conditions; and coercive control, including threats and the withholding of workers' identity documents, which restricts their freedom of movement and leads to social isolation.



3. Food, beverages and nutritional feeds (4%)

The supply of food and beverages is a high-cost, high-volume operation within our hospitals and residential care businesses. The Australian agricultural and fresh produce sector has repeatedly faced convictions for modern slavery incidents, including forced labour and restrictions on freedom of movement.



4. Utilities (3%)

The energy production, waste management, and recycling sectors also depend on labour hire agencies to provide migrant low-skilled workers and are susceptible to modern slavery practices akin to those in the construction sector.



7. Stationery and office supplies (1%)

In 2023, our company changed its primary supplier of stationery and office supplies. Despite the change, this end of the supply chain continues to be linked to South-East Asian countries where there is a high risk of modern slavery practices.



8. Uniforms (<1%)

The clothing, textile, and apparel industries are known to employ workers under conditions reported as modern slavery, such as forced labour and wage underpayment. Additionally, these sectors are often connected to the procurement of raw materials from high-risk countries in Africa and Asia.

B Operations

Two categories within the spend taxonomy are exclusively managed by internal resources.



9. Contingent labour- nursing (50%)



10. Contingent labour- non-nursing (50%)

Our nursing and allied healthcare staffing depend on specialist labour hire agencies instead of direct recruitment. There is a national shortage of staff in these areas, leading to an increasing demand that is being met by migrant workers from around the world, including those from high-risk regions in South-East Asia, Africa, and the South Pacific.

C Both Operations and Supply Chain

Four spend categories have a combination of internal and external service provision.



11. Facilities Management (56%)



12. Cleaning Services and Supplies (23%)



13. Linen and Laundry Services (17%)



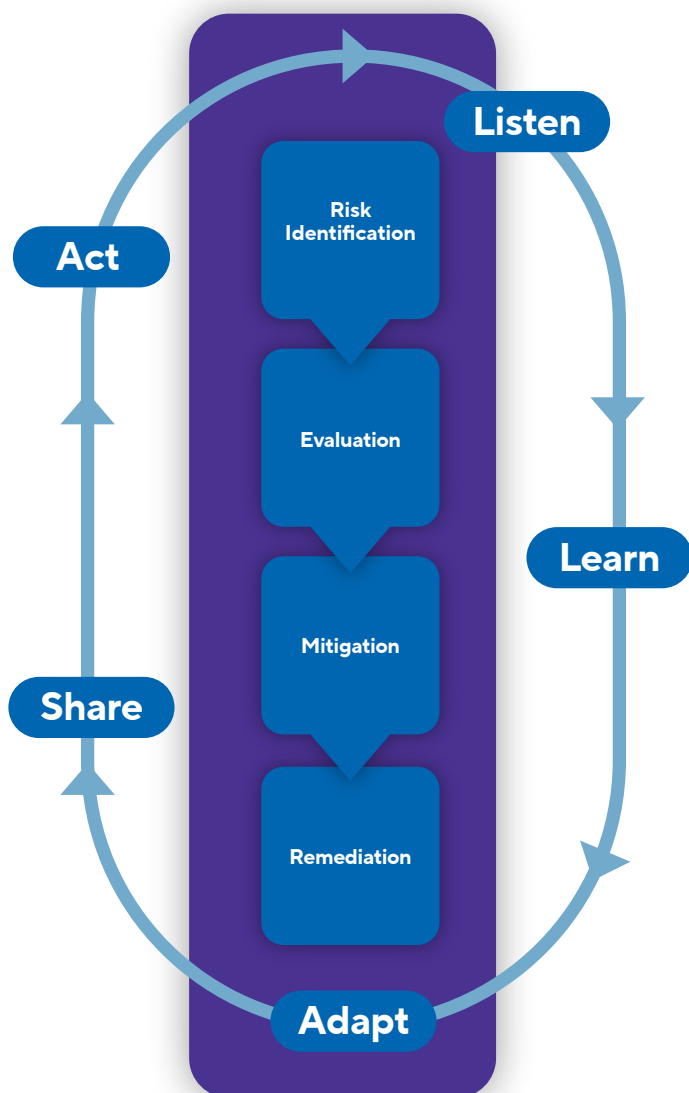
14. Kitchen and Housekeeping (5%)

We manage a diverse array of contracts, encompassing group-level agreements, local facility contracts, preferential contractor arrangements, and services rendered by St Vincent's staff. These include cleaning and security services, laundry, kitchen and catering services, as well as general facilities management services, like electrical and plumbing repairs and maintenance.

In Australia, it is common for suppliers in these sectors to employ temporary migrant workers through sub-contracting or labour-hire arrangements. These arrangements have historically been associated with a high incidence of non-compliance concerning workplace rights and entitlements. Furthermore, the equipment and consumables used in these sectors are predominantly manufactured overseas, especially in high-risk countries such as China, Thailand, and Vietnam.

Continuous Learning Framework

As we further our understanding of potential risks within our supply chains and operations, we recognise the importance of being receptive and adaptable to newly emerging risks. Consequently, we have implemented a continuous learning framework for our modern slavery risk strategy, encompassing risk identification, evaluation, mitigation, and remediation.



Additional risks identified

15. Intersection with Survivors of Modern Slavery and Risks to Frontline Workers:

In our previous statement, we acknowledged the pivotal role healthcare providers play in identifying victim-survivors of modern slavery, who are likely to be encountered within the emergency departments in public hospitals due to the nature of their exploitation. As we continue to enhance our understanding, we have come to realise that our frontline staff – who interact with the victim-survivors of severe exploitation and complex trauma – are also vulnerable and at risk of experiencing trauma themselves.

16. Investments

In 2023, St Vincent's made approximately \$371 million in various investments, adding a new risk category to our operations. It is vital to assess and mitigate the modern slavery risks linked to these investments. This entails examining:

- the management of these risks;
- the parties responsible for managing these risks, such as external funds or asset managers; and
- if managed by external fund managers, whether they are members of the Investors Against Slavery and Trafficking Asia Pacific (<https://www.iastapac.org/>).

17. Awareness of Whistleblower Policy and Other Grievance Mechanisms

It has been noted that both our direct and indirect workforce, which includes staff, contractors, and the workforce of our suppliers, may lack awareness about the different avenues they have at their disposal to report any misconduct related to modern slavery securely and confidentially.

Modern Slavery Risk Identification Framework for Supply Chain

2022

Revisit Framework

Phase 1

Tier-1 Suppliers

Identify High Risk Categories

Focus on Top-100 Suppliers

Synergise with Catholic Peers

Supplier-centric Approach

2023 - 2025

◀ We are here

Phase 2

Beyond Tier-1 Suppliers

Identify High Risk Categories

Top Suppliers by High-Risk Sub-Categories

Identify High Volume Products

Synergise with Catholic Peers

Geographical Mapping

Product-centric Approach

2025 - 2027

Scheduled

Actions taken to assess and address risk

Supplier risk management platform – Sedex Australia

Over the past three reporting periods, St Vincent’s has endeavoured to bring our high expenditure, high-risk suppliers onto Sedex, a third-party technology platform designed to manage and mitigate modern slavery risks within supply chains and operations. The Australian Catholic Anti-Slavery Network (ACAN) collaborates in the onboarding of high-risk suppliers prevalent in the healthcare sector and leverages the platform’s capabilities to disseminate a shared Supplier Self-Assessment Questionnaire (SAQ) and for them to adopt the Sedex Members Ethical Trade Audit (SMETA) methodology with the objectives to:

- manage modern slavery risks with current suppliers;
- compare inherent risks with actual risks;
- incorporate new suppliers into the screening process as part of tenders and onboarding;
- enhance visibility further up the supply chains; and
- track and report on advancements in the supplier profile.

However, like previous years, our suppliers’ adoption rates with the Sedex platform is limited. We observe the following:

- Most of our top 100 high-risk suppliers are large global suppliers especially those providing medical and clinical supplies, and not willing to join Sedex. They have either commenced their own risk management programs, subscribed to other risk tools, or are not eager to complete the SAQs.
- Sedex methodology requires the suppliers to onboard every facility to be fully compliant. This is an extremely time-consuming and costly process, and some suppliers are evaluating how best to prioritise this.
- The quality of data of the SAQs cannot be relied upon as these are self-declarations and independent evaluation is still required for validation.

We acknowledge and understand these challenges and are trying to mitigate these risks by establishing direct communication with the suppliers under our Due Diligence Program (as outlined in the next section).

Supplier Due Diligence Program for Modern Slavery Risks

We continue to advance the implementation of Phase 1 of our **Modern Slavery Risk Identification Framework for the Supply Chain**, concentrating on the top 100 suppliers across 14 high-risk spending categories. To facilitate this, we have initiated the **Supplier Due Diligence Program for Modern Slavery Risks**. This structured program is designed to build upon the principles of our continuous learning framework and is intended to start a collaborative journey between St Vincent’s and its suppliers, focusing on modern slavery due diligence within our commercial partners’ supply chains and operations from 2023 to 2026.

Aligned with our Risk Identification Framework, our Due Diligence Program underpins this collaboration to ensure a unified approach for obtaining greater traceability in our shared supply chain and visibility to the chain of custody beyond Tier 1 suppliers when they are common among ACAN’s member entities. To support this effort, ACAN has established the **Catholic Health Sector Working Group (HSWG)**, which includes representation from eight national Catholic healthcare entities, uniting to address modern slavery risks in their collective supply chains.

St Vincent’s Supplier Due Diligence Program

Goal for next 3 years (2023-2026)

- Identify risks in a supplier’s operations
- Get better visibility into supply chain
- Identify risks with a supplier’s direct inputs
- Identify high-risk geographical locations
- Identify products impacted
- Demonstrate a supplier’s progress in reducing and eliminating risks

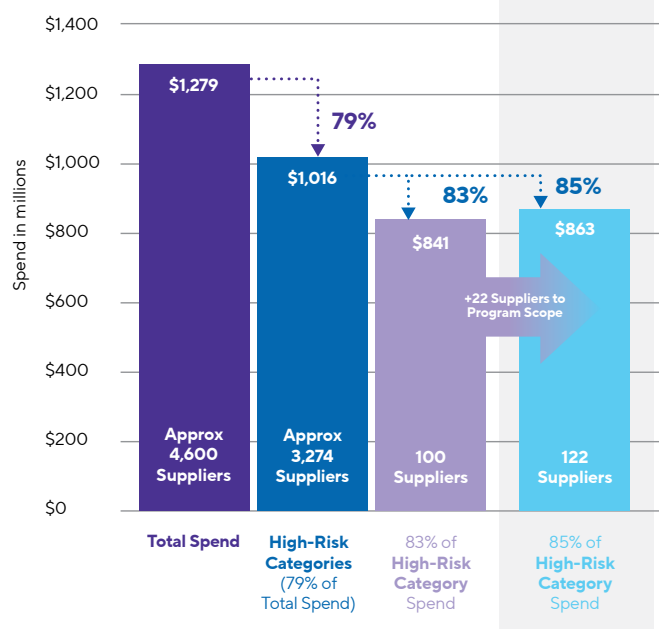
Focus for next 12 months

- Identify a supplier’s priority areas
- Tools used eg: Sedex, Ecovadis
- Efforts beyond surveys and questionnaires
- Grievance processes and incident reports
- Raise awareness
- Collaboration with ACAN HSWG

Progress update for supply chain risk assessment

- Seventy-nine per cent of our expenditure is categorised as high-risk for modern slavery prevalence.
- The top 100 suppliers, ranked by spend, account for 83% of the spend in these high-risk categories.
- Additionally, 22 suppliers in the food and beverage, facilities management, uniforms, and construction sectors have been identified. Despite lower spend, these sectors carry a high potential for modern slavery risks. Combined, these 122 suppliers represent 85% of our high-risk expenditure.
- These 122 suppliers have been incorporated into our Supplier Due Diligence Program.
- A database has been established containing contact details for Supplier Leads responsible for human rights or modern slavery initiatives. Compiling this database presented its own challenges and offered valuable insights into the suppliers' approaches to combating modern slavery, including the diverse structure of their teams, which range from globally-dispersed contacts to a collective of representatives from Risk, Legal, Compliance, Procurement, and Operations backgrounds.
- The database is essential for establishing direct communication with suppliers to advance our due diligence efforts.

SVHA Supply Chain Risk Evaluation



We are collaborating with the ACAN team and Catholic peers within ACAN's HSWG to address the findings from these social audits, assess the effectiveness of corrective actions, and further validate these outcomes through direct engagement via our Supplier Due Diligence Program.

Some other metrics include:

12

social audits completed

20

new SAQs completed.

6

corrective actions taken

15

new suppliers onboarded in Sedex, taking total count to **34**, which are spread across **82** sites and **nine** countries.

64

high-risk suppliers invited to join Sedex.

476

suppliers completed ACAN Risk Assessment Surveys.

Category Spotlight



Category: Construction

As a component of our Due Diligence Program, we collaborated with a supplier specialising in construction and property refurbishment. The supplier was open to partnering with St Vincent's to pinpoint and mitigate modern slavery risks within their operations and supply chain. Over a period of four months of sustained engagement and advisory efforts, the supplier achieved the following advancements:

- Enrolled in Sedex and filled out an SAQ tailored for St Vincent's.
- Identified visa-holding employees as a vulnerable group.
- Modified their internal safety management software to block deceptive recruitment practices, recruitment fees, or retention of personal documents such as passports by labour hire firms.
- Instituted mandatory employment contracts for all direct hires, encompassing part-time, full-time, and casual staff.
- Self-audited internal procedures to guarantee the payment of minimum wages for overtime and shift work.
- Is in the process of deploying the Red Cross Worker Rights Hub Tool to promote awareness during inductions and onboarding at each location.
- Revised tendering conditions for subcontractors to suggest pricing for Australian-made goods where feasible.
- Mandated that all contractors undergo modern slavery awareness training during induction.

We intend to continue this collaborative journey of risk assessment and mitigation during the next reporting cycle, as well as to validate these actions and their effectiveness.



Category: Contingent Labour

As part of the National Action Plan's Commonwealth Grant Award (Round 2 2023-2025), St Vincent's is undertaking a project aimed at migrant healthcare workers to identify gaps and provide training for their recruitment from labour hire agencies.

In this project, we are evaluating the current recruitment processes for migrant staff to identify areas for improvement.

- We have noted varying hiring procedures across hospitals, as well as among different job families, including nursing and non-nursing healthcare staff. We intend to use this data to gather feedback from hiring managers and labour hire agencies to illustrate the current end-to-end recruitment practices for migrant workers.
- The St Vincent's Group Procurement Team has completed a consolidation task, leading to a decrease in the number of recruitment and labour hire agencies actively involved with the organisation.
- In the coming year, we aim to develop training materials for labour hire agencies that will provide guidelines to ensure slavery-free practices, as well as for internal use by our workforce hiring managers.
- For this purpose, we are exploring the IRIS initiative by the United Nations Institute of Migration (IOM), which represents a best-practice model for the ethical recruitment of migrant workers, to determine its applicability in the healthcare sector.
- Additionally, we have begun drafting a Supplier Code of Conduct, which includes specific clauses that set the minimum standards for the recruitment of migrant staff

Category Spotlight (continued)



Category: Office Supplies & Stationery

In September 2023, St Vincent's changed its main office supplies provider. As part of this process, we are reviewing our catalogue of regularly bought items and services. This review is also an opportunity to transition from products sourced from high-risk countries in Southeast Asia to those produced locally, including goods made by First Nations' businesses. This aligns with the St Vincent's Reconciliation Action Plan and its commitment to Aboriginal and Torres Strait Island communities. It contributes to the greater good by fostering long-term economic success for these businesses, their owners, and communities, thereby positively impacting health outcomes.



Category: Cleaning

Risks linked to cleaning are distributed evenly across our supply chain and operations, with some facilities depending on external cleaning specialists and others using labour hire agencies to employ in-house staff under the St Vincent's payroll. To advance our due diligence in this area, we are collaborating with the ACAN team and the Cleaning Accountability Framework (CAF), a national body dedicated to enhancing labour practices in the cleaning sector.

We have identified St Vincent's facilities that are ideal for a pilot accreditation and aim to advance this within the next 12 months. This initiative will enable us to learn best-practice in human rights due diligence, including independent audits for our service contractors, and to extend these practices to other locations and indirect service categories such as laundry, catering, security, and construction.



Operations: Intersection with survivors of modern slavery

An additional component of the National Action Plan's Commonwealth Grant Award is the enhancement of front-line staff skills to improve screening processes for more effective identification of victim-survivors at healthcare facilities.

Over the next 18 months, our objectives include:

- Gathering feedback from staff and experts to perform a gap analysis;
- Developing tailored training materials;
- Supplying the necessary tools and resources for clinicians and social workers;

- Expanding the number of trained advocates; and
- Establishing a peer support network for staff who may be affected by the trauma of working with severely exploited victims.

We are collaborating with ACRATH (Australian Catholic Religious Against Trafficking in Humans) and the Office of NSW Anti-Slavery Commissioner for progressing these efforts.

Training and Raising Awareness

Training and raising awareness are used to educate our staff, other organisations and the broader community. Studies have shown that awareness, education, storytelling, and narratives are highly effective in addressing social issues, and that well-informed individuals are less likely to ignore these issues. Raising awareness can empower affected individuals to speak out. Consumers aware of the issues are also discouraged from purchasing products made with forced labour.

Recognising the need for raising awareness and our commitment to continuous improvement, St Vincent's identified that our staff required comprehensive training to understand how modern slavery occurs within the healthcare sector. To complement our online learning resources, our Modern Slavery Sub-Committee arranged a series of quarterly Modern Slavery Community of Practice sessions. These sessions provided targeted training and education from top experts and government agencies, including:

- A social worker specialising in human trafficking and slavery response, and gender-based violence, particularly forced marriage. Her session focused on identifying and responding to modern slavery (May 2023).
- A lived-experience Practice Lead at the Office of NSW Anti-slavery Commissioner. With her extensive background as a nurse and a survivor of modern slavery, she guided our clinicians in recognising red flags in a trauma-informed manner through case studies (August 2023).
- The Australian Federal Police (AFP) Human Trafficking Team presented the challenges of detecting human trafficking and modern slavery in the health sector (November 2023).

Each training session was attended by over 100 staff members, representing a diverse group of clinicians such as nurses, medical officers, social workers, psychologists, pastoral care workers, speech pathologists, pharmacists, dietitians, peer support workers, occupational therapists, physiotherapists, and administrators.

In May 2023, our enterprise-wide legal team, comprising legal counsel from our national office as well as our hospitals and health networks, Contract Managers, and Risk and Compliance Officers, participated in another training session. The focus was on discussing the potential indicators of modern slavery and related exploitation within our operations and supply chain. The session also addressed the essential reviews needed to ensure our organisational policies, processes, and contractual clauses remain current.



Supplier contracts and contract management platforms

As our understanding of modern slavery and the healthcare sector's unique needs deepen, we are consistently reviewing supplier contracts to strengthen sector-specific controls and ensure compliance. In this effort, we are expanding the use of the Open Windows, our platform for managing contracts with suppliers throughout our supply chain. This is enhancing our oversight of supplier contracts and enables St Vincent's to monitor contractual compliance with auditable trails, providing a centralised repository for all modern slavery-related documentation, reports, and annual statements.

Furthermore, we augment this with another supplier management platform, LinkSafe, that is used for tracking supplier accreditation and compliance. LinkSafe now includes the ACAN Modern Slavery Survey for new supplier onboarding, as well as the annual confirmation from existing suppliers, thereby embedding responsible supplier practices throughout the supplier lifecycle management process.

Our assessment has highlighted the necessity for a Supplier Code of Conduct, which will outline the minimum standards expected by St Vincent's from its suppliers and contractors to align with our stance on human rights. Additionally, we have begun the process of reviewing current contracts with labour hire agencies to establish a suitable commercial framework that ensures fair wages for workers. Both document templates are in the drafting stage, with completion expected in late 2024. We intend to share them with our supplier community by early 2025.

Grievance Mechanism

We urge our employees and partners to voice any concerns or conduct that may be troubling them. It demonstrates our commitment to maintaining a fair and respectful workplace environment for all individuals involved in our organisation. This includes any actions that may undermine our mission and values, or any fraudulent, corrupt, illegal, or unethical behaviour. We offer reliable avenues for those wishing to report such issues. Below are some of the formal and informal channels available:

- FairCall, the St Vincent's whistleblower hotline, is a secure, independently-monitored service dedicated to the anonymous reporting of any suspected theft, financial crime, fraud, or unethical conduct. This service is accessible to current or former employees of St Vincent's, as well as contractors, consultants, suppliers, service providers, and volunteers.
- Ethos is a structured St Vincent's program that empowers staff to speak up if they encounter an issue that undermines patient or staff safety. Ethos utilises graded assertiveness tools like CUSS (Curious, Unsure, Seriously Concerned, Stop) to provide a sequence of questions and statements to facilitate the raising of concerns.
- Have Your Say is the St Vincent's annual engagement survey. It gathers feedback from our staff to enhance our workplace and ensure we focus on what is important to our people.

Additionally, St Vincent's maintains a Grievance Resolution Policy, which we are reviewing to align with our Modern Slavery Policy and the in-draft Supplier Code of Conduct. Once completed, these documents will collectively outline the process for addressing and resolving grievances raised by employees, contractors, consultants, suppliers, service providers, and volunteers.

Remediation

St Vincent's is committed to actively remediating any modern slavery impacts on individuals that are caused by, contributed to, or directly linked to our operations and supply chains. We will engage in transparent, respectful, and collaborative remediation processes to address and rectify any harm done. We expect our suppliers to uphold the same commitment to human dignity and decent work and conditions, ensuring that they prevent harm and contribute to meaningful and effective remedies.

St Vincent's will maintain transparency in any efforts to provide for, or cooperate in, the remediation of modern slavery by including any specific actions and outcomes in our annual Modern Slavery Statement.

St Vincent's also has access to Domus 8.7 to assist with its modern slavery remediation and resolution.

Established as a not-for-profit with ACAN's support, Domus 8.7 offers remediation services and confidential advice to those impacted by modern slavery. It assists in triaging cases and directing victims to specialists, both internal and external, who can offer support, advice, and assistance concerning legal, social, and human rights matters related to modern slavery. Additionally, it works with international organisations to ensure the availability of supply chain remediation and preventive measures.

We have recognised the need to enhance awareness among our staff by providing a confidential and safe environment for them to express their concerns. To this end, we are revamping our communication strategy to introduce a variety of channels, including the use of organisational social media platforms, ensuring easy accessibility for all employees.

Key performance highlights in 2023



Introduced a **Continuous Learning Framework** throughout our enterprise-wide Modern Slavery function to stay open and receptive to embrace newer ways of addressing this global human rights problem.



Continued collaboration with ACAN to establish the **Health Sector Working Group (HSWG)** for unified supply chain investigation of suppliers shared with other Catholic healthcare entities.



Initiated a **Supplier Due Diligence Program** for Modern Slavery to engage with high-risk suppliers and enhance transparency in their supply and custody chains.



Incorporated **22 low-spend, high-risk suppliers** into the top-100 suppliers list of the Due Diligence Program, now accounting for **85% of the total high-risk expenditure**.



Conducted **targeted training sessions** for team members, presented by subject matter experts, with tailored content, enabling our staff to better recognise how indicators of modern slavery may arise in their daily roles.



Received a **Commonwealth Grant** under the **National Action Plan to Combat Modern Slavery 2020-2025 (Round 2)** to improve the screening of modern slavery survivors presenting to healthcare facilities, and the recruitment processes for migrant healthcare workers.



Signed a Memorandum of Understanding (MoU) with the **NSW Anti-slavery Commissioner** to aid our Commonwealth Grant-related work through the exchange of industry best-practice, knowledge and resources.

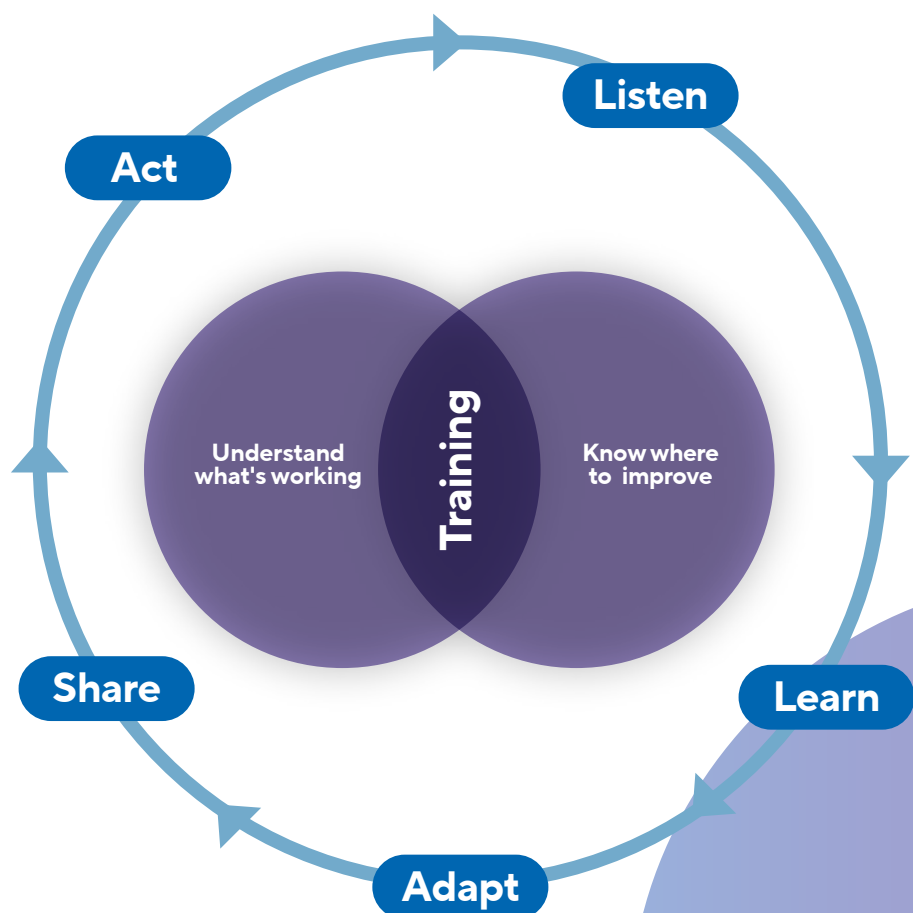


Partnered with ACRATH to build upon our work from 2019 for the screening of modern slavery survivors and the development of training resources.

Effectiveness Assessment

St Vincent's is committed to integrating our continuous learning framework into our current comprehension of the issues and challenges involved in tackling modern slavery within our operational ecosystem.

Utilising this, we have embraced the following framework to persistently identify gaps and pitfalls, as well as to discover innovative methods to enhance our response to these challenges.





In consultation with ACAN, St Vincent's has moved towards a more standardised and continuous process improvement to create a scorecard for evaluating the effectiveness of our actions. This includes the following four pillars:

Pillar 1 – Governance and Compliance

- Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
- Considers the broader initiatives and engagements we undertake to address modern slavery.

Pillar 2 – Operations

Focuses on internal practices and how effectively we manage risks within our day-to-day activities.

Pillar 3 – Supply Chain

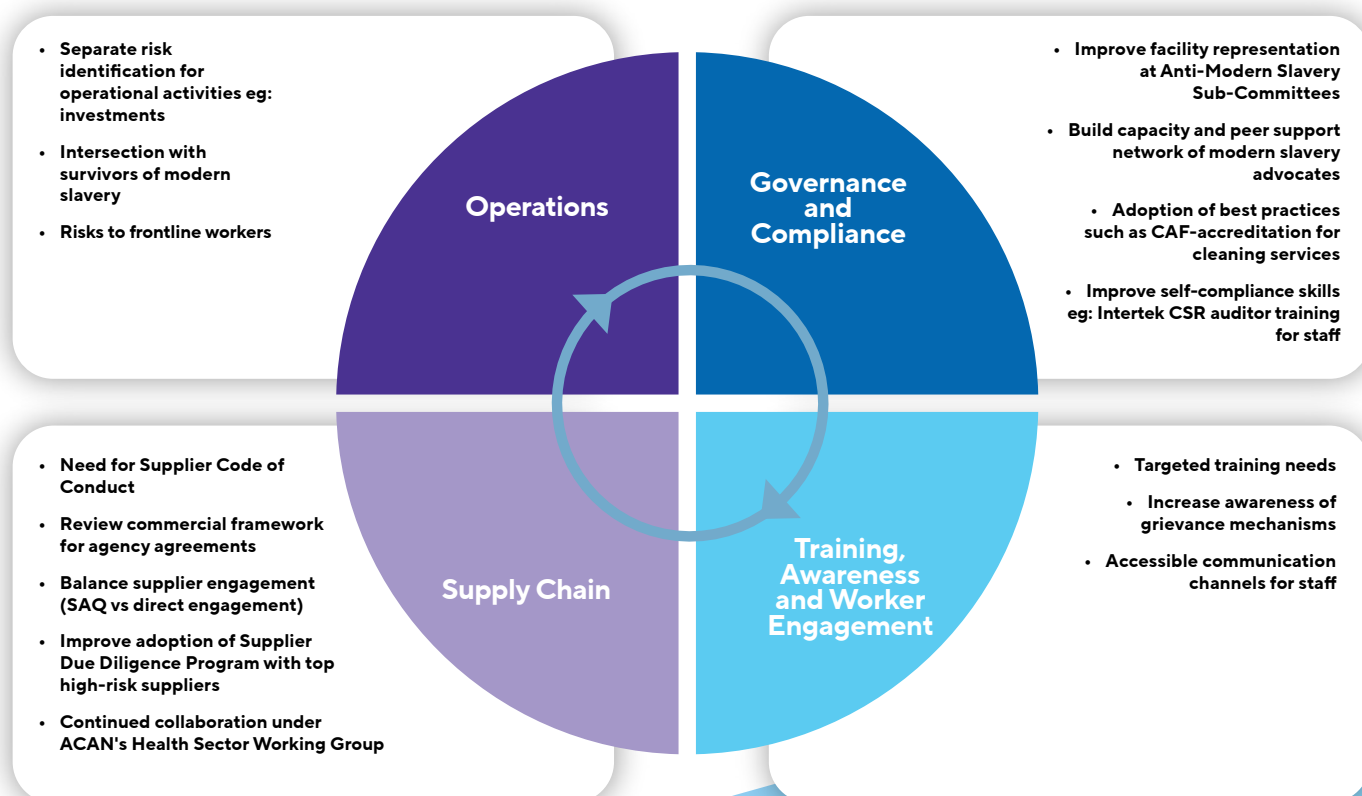
Examines our external partnerships and the mechanisms in place to assess and mitigate risks within supply chain.

Pillar 4 – Training, Awareness and Worker Engagement

- Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
- Evaluates the channels available for grievance mechanisms, reporting concerns and the processes for addressing them.

We identify areas for improvement in the section below.

Outcome of effectiveness assessment – needs improvement



Process of consultation with entities owned or controlled

Consultation as between the parent company St Vincent's Health Australia Ltd and its subsidiaries and affiliates in the preparation of this statement has taken place via the Board and ELT (as described in Criterion 2), the Group Procurement team, as well as the Board's Mission Ethics and Advocacy Committee, the Audit and Risk Committee, and the Anti-Modern Slavery Working Groups which comprise staff representing different group entities, facilities and group functions.

Considering these structures, St Vincent's considers it is reasonable and appropriate for the parent company to provide this joint statement on behalf of all reporting entities in the group, including a consolidated description of their actions to address modern slavery risks.

Any other relevant information

Enforceable Undertaking

In December 2023 St Vincent's signed an Enforceable Undertaking (EU) with the Fair Work Ombudsman (FWO). The EU acknowledged that St Vincent's identified and self-reported the underpayment of entitlements to private hospital and aged care team members in NSW and Queensland as a result of incorrectly applying a provision in the relevant enterprise agreement. All employees received their back-pay in full in 2022.

Community Engagement

We have continued to engage with the community to raise awareness of collaborative opportunities within the healthcare sector to combat modern slavery, including:

- Presentation at the National Chartered Institute of Procurement and Supply (CIPS) Conference in May 2023. In partnership with the University of Sydney, St Vincent's Modern Slavery Liaison Officer (MSLO) discussed 'The Australian Healthcare Provider's Perspective on Modern Slavery' and shared insights based on a qualitative review of modern slavery statements from over 160 healthcare entities.
- In September 2023, St Vincent's Chair, Paul McClintock AO, delivered the keynote address at a Catholic Leaders Forum organised by the University of Notre Dame Australia. His speech emphasised the significance of compassionate leadership in fostering remedies and collaboration among Catholic peers to address this global issue.
- Participation in the Freedom Links Project in June-July 2023. St Vincent's Modern Slavery Advocates engaged in the Catholic Archdiocese of Sydney's Freedom Links Project, led by the ACAN team, to conduct an environmental scan focused on identifying and responding to individuals affected by modern slavery within Catholic healthcare services.
- St Vincent's Modern Slavery Advocates and MSLO attended the National Modern Slavery Conference in Melbourne in June 2023.
- St Vincent's provided an update on work related to its Commonwealth Grant project at the National Roundtable on Human Trafficking and Slavery organised by the Federal Attorney General's Department in December 2023.



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Always.



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