



Courageously
committing
to the future

Modern Slavery Statement

Statement for period 1 January 2024 to 31 December 2024



ST JOHN OF GOD
Health Care



Contents

Disclosure notes

This is a joint modern slavery statement made by St John of God Health Care Inc (ARBN 051 960 911) on behalf of itself and the entities it controls or owns, including:

St John of God Hawkesbury District Health Campus Ltd (ACN 608 054 379)
– (St John of God Hawkesbury handed back to NSW on 1 July 2024)

St John of God Outreach Services (ACN 064 831 965)

St John of God Foundation Inc (ARBN 066 805 132)

St John of God Midland Health Campus Ltd (ACN 152 874 845)

Dencross Pty Ltd (ACN 086 647 298)

St John of God Berwick Health Campus Ltd (ACN 606 404 915)

Marillac (ACN 050 463 717) together, for the purposes of this statement “St John of God Health Care”.

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Statement from St John of God Health Care Board Chair and Group CEO

At St John of God Health Care, our commitment to compassionate care and the inherent dignity of every person is deeply rooted in the tradition of the Sisters of St John of God.

We stand unequivocally against modern slavery and all forms of exploitation.

We understand that modern slavery often exists in hidden and complex ways, especially within supply chains. That's why we work closely with our suppliers and contractors to uphold human rights and embed transparency and fairness into our practices.

Over the past year, we've continued to strengthen our approach. We've undertaken comprehensive audits and risk assessments across a broad network of suppliers and embedded anti-modern slavery provisions into both existing and new contracts. These actions reflect our values, supported by strong corporate governance and an organisational culture that prioritises ethical, responsible conduct.

Collaboration remains key. Our partnerships with the Australian Catholic Anti-Slavery Network (ACAN), Catholic Health Australia (CHA), and the Catholic Network Australia (CNA) have been instrumental in helping us identify and reduce modern slavery risks more effectively.

We are proud to report measurable progress, and in 2024 we achieved a 9% improvement in our modern slavery maturity index, reaching 91% against a target of 50%. This growth reflects progress across every assessment area and reinforces our commitment to continual improvement.

Tackling modern slavery requires a united front. We are dedicated to working alongside government, industry, and our partners to drive systemic change.

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This is our fifth Modern Slavery Statement, formally reviewed and endorsed by the St John of God Health Care Board. It reaffirms our unwavering commitment to ending modern slavery and protecting the dignity and rights of all people.

A handwritten signature in black ink, reading "Kerry Sanderson".

Hon Kerry Sanderson AC CVO
Board Chair

A handwritten signature in black ink, consisting of stylized initials "BP".

Bryan Pyne
Group CEO

This Modern Slavery Statement was approved by the principal governing body of St John of God Health Care Inc as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 30 May 2025. This Modern Slavery Statement is signed by a responsible member of St John of God Health Care Inc as defined by the Act.

Roadmap

Strengthening accountability,
protecting human dignity

At St John of God Health Care, we recognise that addressing modern slavery is not just a legal obligation but also a moral imperative. Our commitment to strengthening accountability ensures that we continually refine our processes, enhance transparency and take decisive action to mitigate risks within our supply chain and operations. At the heart of our efforts lies our unwavering dedication to protecting human dignity, ensuring that every person, whether a caregiver, supplier or community member, is treated with respect, fairness and justice.

This Modern Slavery Roadmap outlines our journey from awareness to action, marking key milestones as we deepen our impact, strengthen compliance and embed ethical practices that drive meaningful and lasting change. Together, we continue to uphold the values of compassion, integrity and social responsibility in the fight against modern slavery.

Initial awareness and mobilisation

Engaged with catholic peer and industry groups

Undertook due diligence activities.

Approach

Conducted risk assessment and gap analysis

Reviewed ACAN Modern Slavery 101 training program and approved for use with minor adaptations for St John of God Health Care

Deployed training to steering committee

Developed policies and procedures

Engaged with high priority Tier 1 suppliers

Established a working group

Launched awareness and communication campaign.

2019

2020

Extend and involve

Updated supplier agreement and RFX templates to include modern slavery clauses

Added modern slavery clauses into new agreements (Tier 1 supplier, ICT and PPE categories)

Reviewed ACAN Modern Slavery 101 training program and added all available modules to St John of God Health Care's Learning and Development platform

Reviewed and updated Business Maturity Assessment

Reviewed approach/framework

Reviewed change impact assessment

Added the top 25 suppliers to the Sedex platform

Reviewed policies and procedures

Extended risk assessment beyond Tier 1 suppliers

Reviewed goals, targets and KPIs

Partnered with ACRATH to communicate the impact of modern slavery in our supply chains.

2021

Effectiveness review and monitoring

Updated supplier agreement and RFX templates to include modern slavery clauses

Embedded modern slavery clauses into new Tier 1 supplier agreements, specifically within ICT and PPE categories

Reviewed all ACAN modern slavery training modules and integrated them into SJGHC Learning and Development platform

Reviewed and updated Business Maturity Assessment

Evaluated and refined the modern slavery framework and approach

Conducted a review of the change impact assessment framework

Invited top 50 suppliers to join the Sedex platform to improve supply chain transparency

Reviewed and updated relevant policies and procedures

Expanded taxonomy risk assessment to cover all active suppliers

Reviewed goals, targets and KPIs related to modern slavery initiatives

Partnered with ACRATH, CAN, ACAN, Catholic Health and Catholic Missions to communicate the potential impact of and collaborate with them on modern slavery risks in our supply chains.

2022

Operationalisation: Continue effectiveness review and monitoring

Enhanced campaigns to improve communication and awareness on Modern Slavery

Refined our supplier engagement and communication strategies

Rolled out modern slavery training to 89 caregivers with key supply chain responsibilities at SJGHC

Continued to add modern slavery clauses into Tier 1 commercial agreements across key categories

Mandated "Modern Slavery 101" training as compulsory for procurement, supply chain, facilities management and selected teams via the Learning and Development platform

Reviewed and updated the Business Maturity Assessment

Evaluated and further refined our modern slavery framework

Reviewed our modern slavery policies and procedures

Enhanced supplier engagement across high-impact categories

Collaborated with ACEN, CAN and Health care Forum peers to leverage insights and improve visibility into supply chain risks.

2023

Enhancing Maturity and Effectiveness

Strengthened our commitment to ethical supply chain practices and modern slavery prevention, we will continue refining our approach in key areas:

Communication and Awareness

Enhanced and expanded our awareness campaign to improve stakeholder engagement and understanding

Strengthened Supply Chain Risk Management

Supplier Engagement:

- Engaged with 638 suppliers to review, assess and develop risk mitigation plans where necessary

Supplier Ethical Data Exchange (Sedex)

Platform Integration:

- Expanded supplier onboarding via Sedex, with 121 new suppliers joining
- Support 122 suppliers in completing Self-Assessment Questionnaires (SAQs)

Social Audits and Corrective Actions:

- Conducted 18 supplier social audits to assess compliance and ethical practices
- Implemented 81 corrective actions based on Sedex assessments and self-audits

Contract Review and Compliance

Integrated modern slavery terms into 298 contracts and variations, including 50 ethical sourcing declarations under blanket purchase agreements

Governance and Risk Alignment

Reclassified our assessment taxonomy to align with ACAN recommendations, now covering 40 spend categories for better risk assessment and monitoring

Training and Capability Building

Provided modern slavery awareness training to 120 suppliers' staff

Maintained internal training for 93 caregivers to provide ongoing awareness and compliance

Continuous Improvement

Maintain and expand existing activities to drive maturity and effectiveness across our ethical sourcing and modern slavery prevention efforts.

Setting new standards

Embed modern slavery practices into Strategy

Implement monitoring tools to assess supplier risks using AI and data analytics

Expand direct supplier mapping, training and capacity building beyond Tier 1 suppliers to include Tier 2 and Tier 3 suppliers

Expand direct supplier audits beyond Tier 1 suppliers to include Tier 2 and Tier 3 suppliers

Strengthen collaborations with ethical sourcing organisations to enhance responsible procurement

Develop remediation protocols for suppliers found in breach of ethical labour standards.

Pilot ethical procurement certifications for high-risk supplier categories

Introduce modern slavery awareness modules in caregiver onboarding and professional development programs.

2025 &
Beyond

2024

About us

St John of God Health Care is a ministry of the Catholic Church.

St John of God Health Care is one of Australia's largest Catholic not-for-profit health care providers, delivering high-quality health and community services across Australia and New Zealand.

Founded in 1895 by the Sisters of St John of God in Western Australia, our organisation has a long-standing tradition of compassionate care. Today, we operate 26 facilities and number of national services and employ over 16,500 dedicated caregivers.

As a mission-driven organisation, we reinvest all surpluses into the communities we serve, enhancing our services, expanding and modernising facilities, adopting advanced medical technologies, developing new programs, and supporting people in need through our social outreach initiatives.

Our comprehensive services include:

- Acute private hospitals
- Specialist mental health care
- Rehabilitation services
- Public-private partnerships
- Social outreach and community programs.

Structure

St John of God Health Care Inc. is an incorporated association, the members of which are the directors of St John of God Australia Ltd, a civil and canon law entity established in 2004 to sponsor the ministry that was previously sponsored by the Sisters of St John of God.

The Sisters are members of St John of God Australia Ltd and share sponsorship of the ministry with eight of the dioceses in which the group operates.

St John of God Health Care is a wholly owned and controlled entity of St John of God Australia Ltd, a civil and canon law entity established in 2004 to sponsor the ministry previously sponsored by the Sisters of St John of God.

The directors of St John of God Australia Ltd are the Trustees, who are also the members of St John of God Health Care. The Trustees appoint members of the Board.

The Board provides direction and guidance to the Group Chief Executive Officer and through him the Executive Committee, which oversees performance in line with organisational priorities.



Our symbol

The pomegranate symbol represents our heritage – as the original symbol of the Sisters of St John of God – and our Vision for the future. The cross is the symbol of Christianity, reminding us of Jesus' suffering and our call to follow in His footsteps. Our five Values are reflected in the five seeds of the pomegranate, which is open to allow the seeds to scatter, providing new life and symbolising the generosity of self-giving to people in need.

Vision

We are recognised for care that provides healing, hope and a greater sense of dignity, especially to those most in need.

Mission

To continue the healing mission of Jesus.



Service Ethos

Service is central to how we bring the Mission to life at St John of God Health Care. Our development programs aim to support and equip our caregivers with contemporary and best in class capability in providing exceptional service.

The key tenets of our Service Ethos are:

- Our Mission inspires our service – we are continuing a great story of service entrusted to us by our founders.
- Relationships are central – every encounter is an opportunity and can have far-reaching effects.
- The way we work together as a community, in our own teams and with other teams, is integral in our effectiveness.
- Governance and management of resources are key to our success.
- Feedback and evaluation about how well we are doing is crucial.
- Relationships are central – every encounter is an opportunity and can have far-reaching effects.
- The way we work together as a community, in our own teams and with other teams, is integral in our effectiveness.
- Governance and management of resources are key to our success.
- Feedback and evaluation about how well we are doing is crucial.

Services

St John of God Health Care provides a comprehensive range of health care services across multiple locations in Australia, including:



Medical and Surgical Services

High-quality medical and surgical treatments across various specialties.

Mental Health Care and Therapy

Inpatient and outpatient mental health services, including psychology, psychiatry and counselling.

Rehabilitation

Comprehensive rehabilitation programs to support recovery from injury, illness or surgery.

Community and Youth Services

Programs and outreach initiatives supporting youth and community health and wellbeing.



Disability Support Services

Assistance and services tailored to individuals with disabilities to enhance independence and quality of life.

Home Nursing

Professional nursing care provided in the comfort of patients' homes.

Self-Funded Health Care

Flexible health care options for patients who choose to self-fund their medical treatments.

Cancer Care

Comprehensive oncology services, including chemotherapy, radiation therapy and supportive care.



Cardiac Service

Specialised heart care, including interventional cardiology and cardiothoracic surgery.

Emergency Medicine

24-hour emergency departments providing immediate care for acute illnesses and injuries.



Palliative Care

Compassionate support for patients with life-limiting illnesses, focusing on comfort and quality of life.

Allied Health Services

A range of services, including physiotherapy, occupational therapy, dietetics and speech pathology.

Pastoral Services

Spiritual and emotional care for patients and their families, respecting diverse beliefs and traditions.



Maternity

Expert maternity care, including pregnancy, birth and postnatal services.

Telehealth Services

Remote medical consultations and health care support through digital platforms.

We are committed to delivering the highest quality care to meet the diverse health care needs of the communities we serve.

Reporting Criteria 1 & 2

About St John of God Health Care

Governance and organisational structure

St John of God Health Care operates under a robust governance and corporate structure that ensures strategic oversight, accountability and ethical leadership. As a not-for-profit Catholic health care provider, St John of God Health Care is governed by a Board of Trustees, who uphold the organisation's Mission, Values and adherence to the principles of Catholic health care.

The Board delegates operational responsibilities to the Group Chief Executive Officer and an Executive Committee, who oversee the day-to-day management of the organisation. St John of God Health Care maintains strong governance frameworks, policies and risk management processes to ensure compliance with regulatory requirements, uphold clinical and corporate excellence, and drive continuous improvement. The organisation also engages with key stakeholders, including caregivers, patients, government bodies and the broader community, to align its services with emerging health care needs while maintaining financial sustainability and social responsibility.

Our governance framework

St John of God Health Care operates within a two-tiered governance structure, comprising Trustees and a Board, ensuring robust oversight, ethical leadership and compliance with regulatory and industry standards.

The Trustees hold canonical responsibility for St John of God Health Care and safeguard the organisation's Mission, Values and adherence to Catholic health care principles. They appoint and evaluate the performance of Board members, ensuring governance structures support the organisation's long-term sustainability and strategic direction.

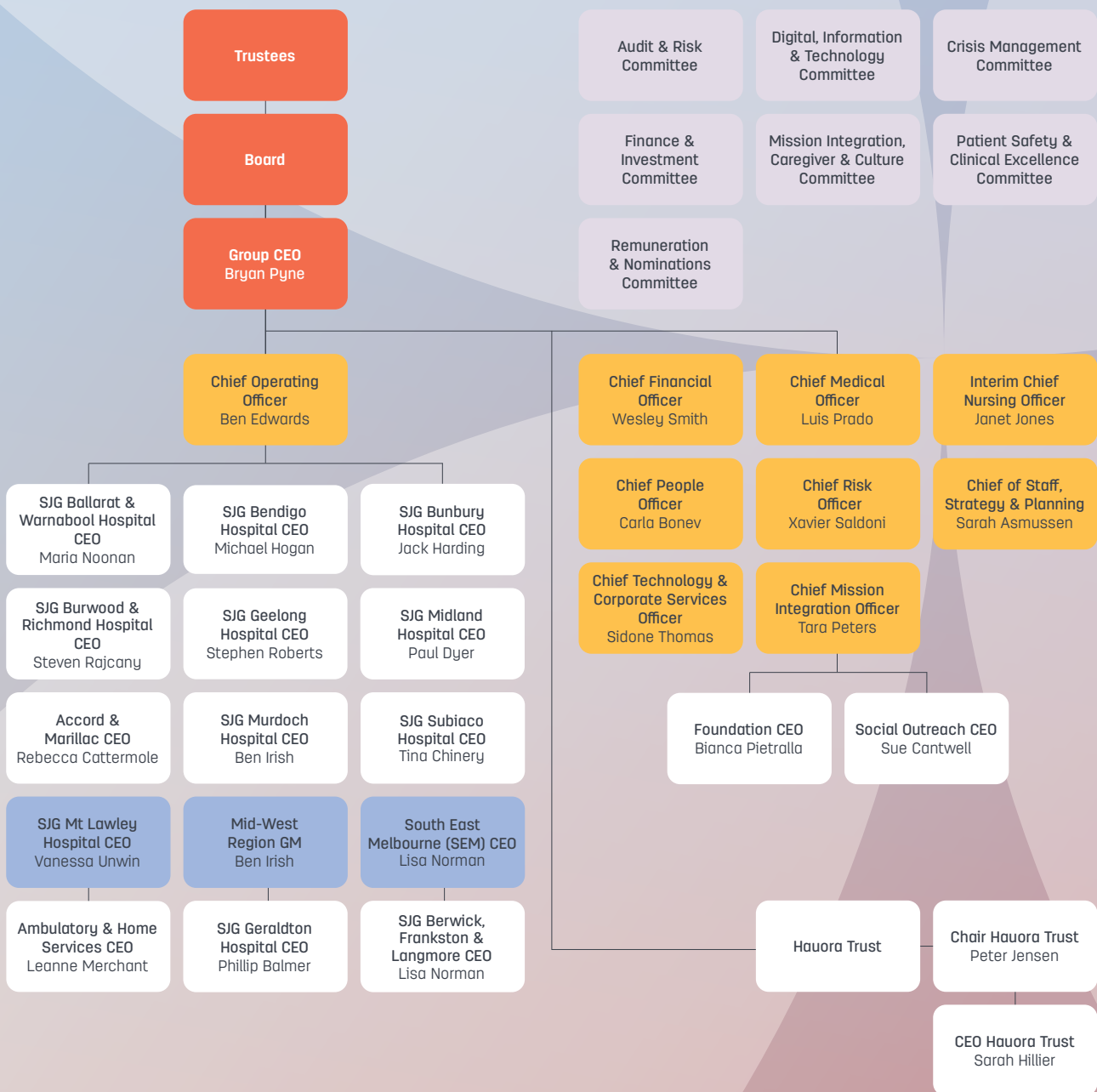
The Board is accountable for stewardship and strategic development, overseeing St John of God Health Care's operations, financial sustainability and risk management. The Board is supported by Board committees, including the Audit and Risk Committee (ARC), which plays a critical role in financial governance, risk management and regulatory compliance. The ARC provides independent oversight of the organisation's financial reporting, internal and external audit processes, risk mitigation strategies and internal controls, ensuring transparency and accountability in decision making.

St John of God Health Care applies principles of good corporate governance and best practices, drawing from recommendations by the Corporate Governance Council of the Australian Stock Exchange (ASX) and other leading governance bodies. The organisation integrates transparent decision making, ethical procurement, financial integrity, patient safety and workforce accountability into its governance approach.

The roles and responsibilities of the Trustees, Board and management are formally outlined in the St John of God Health Care Inc. Constitution. Delegated responsibilities to management are further detailed in the Governance Authority Matrix and Management Authority Matrix, ensuring clarity in leadership, decision making and accountability across all levels of the organisation.

This framework underpins St John of God Health Care's commitment to delivering high-quality, sustainable health care while maintaining its duty of care to patients, caregivers and the broader community.

Our organisational structure





Our locations

Head Office Location

St John of God Health Care’s head office is located at Level 1, 556 Wellington Street, Perth, Western Australia, 6000.

Australian Operations

Western Australia

Perth Metropolitan Area

- St John of God Subiaco Hospital
- St John of God Murdoch Hospital
- St John of God Mt Lawley Hospital
- St John of God Midland Public and Private Hospitals

Regional Areas

- St John of God Bunbury Hospital
- St John of God Geraldton Hospital

Victoria

- St John of God Ballarat Hospital
- St John of God Bendigo Hospital
- St John of God Berwick Hospital
- St John of God Geelong Hospital
- St John of God Warrnambool Hospital
- St John of God Frankston Rehabilitation Hospital

New South Wales

- St John of God Burwood Hospital
- St John of God Richmond Hospital
- Hawkesbury District Health Service (handed back to NSW on 1 July 2024)

New Zealand Operations

- St John of God Halswell (Christchurch)
- St John of God Wellington

Year in review



Established in 1989 by the Sisters of St John of God, who first came to Western Australia in 1895

16,500¹

Caregivers
employed throughout Australia and New Zealand

68,641¹

patient visits
delivered at home in Victoria and Western Australia



Third largest private hospital operator in Australia and the second largest not-for-profit Catholic health care provider in the country

402,054¹

Patients
Treated overnight and same day

54,433

cancer admissions



26¹

Facilities
comprising 3,367 beds in Western Australia, Victoria, New South Wales and New Zealand

80.3

Patient Net Promoter Score
which measures patient experience and satisfaction at our acute hospitals.

11,108

babies born in our hospitals

\$30.3m

Social outreach investment
to assist people experiencing disadvantage

18,690

community mental health care visits

>\$2b¹

Revenue

910

surgeries performed daily

18,306

admissions for mental health services

¹ Includes Hawkesbury District Health Service. Operating contract with St John of God Health Care ceased on 30 June 2024

Our people

St John of God Health Care employs more than 16,500 caregivers across Australia and the Asia-Pacific region. We are a values-driven and inclusive organisation that recognises and celebrates the diverse skills, experiences, and perspectives of our caregivers.

Composition of our Workforce

48%

of our workforce are professional nurses and midwives

80%

of caregivers are female

50%

of our Senior Executive are female

5,015

accredited specialist doctors provide care in our hospitals

878

volunteers support patients and visitors, contributing to a welcoming and compassionate environment

Diversity and Inclusion

We are committed to fostering a workplace where everyone feels safe, respected, and that they truly belong.

40

40 caregivers identify as Aboriginal

34

caregivers have disclosed a disability

We actively support and engage with Aboriginal and Torres Strait Islander peoples in our workforce and broader community

Our commitment to diversity and inclusion is embedded across all levels of the organisation, helping ensure that every caregiver can thrive and contribute meaningfully.

The employment of people with disability is a growing feature of the organisation's recruitment and selection process and a critical component of our Disability Access and Inclusion Plan.

St John of God Health Care is committed to fostering caregiver wellbeing and wellness, recognising that the health and satisfaction of caregivers is integral to delivering exceptional patient care. In 2024, St John of God Health Care implemented several initiatives to support and enhance caregiver wellbeing:

- **Professional Development:**

A total of 68 caregivers across St John of God Health Care were awarded scholarships to support their professional development and career aspirations.

- **Recognition Programs:**

The Living Values Award was introduced to recognise and celebrate the exceptional efforts of caregivers who exemplify the Mission and Values of St John of God Health Care.

- **Cultural Engagement:**

The Innovate Reconciliation Action Plan 2024–2026 was launched, reflecting St John of God Health Care's commitment to cultural engagement and support for Aboriginal and Torres Strait Islander communities.

These initiatives underscore St John of God Health Care's dedication to creating a supportive and enriching environment for caregivers, ensuring they are well equipped and motivated to provide high-quality care to patients and the community.

Our operations

Hospital Operations and Nursing:

- **Facilities and Services:** The organisation operates 14 private hospitals across Western Australia, Victoria and New South Wales, specialising in acute care with renowned services in maternity, oncology and orthopaedics. This includes three specialist mental health hospitals – St John of God Richmond and Burwood Hospitals in New South Wales, and St John of God Langmore Centre in Victoria – and a dedicated rehabilitation hospital, St John of God Frankston Rehabilitation Hospital in southeast Melbourne. Additionally, the organisation manages St John of God Midland Public Hospital in Western Australia under a public-private partnership. Collectively, these 14 hospitals offer 3,367 beds.
- **Patient Care:** In the 2023-24 fiscal year, the hospitals treated over 402,054 overnight and same-day patients, delivered more than 11,108 babies and maintained their status as the largest provider of private maternity services in Western Australia. The organisation also operates various public and community health care contracts across all three states.

St John of God Social Outreach Services:

- **Scope and Reach:** As a not-for-profit organisation, St John of God Health Care has a proud history of providing outreach services in areas of unmet need. Delivered by St John of God Social Outreach, these services are offered across 53 locations in Australia, either for free or at a low cost, and funded through allocations from hospital revenues.

- **Services Provided:** In 2023-24, Social Outreach supported 4,087 individuals and provided 48,487 nights of stable accommodation. Its services aim to build capacity and support the physical, mental and emotional wellness of vulnerable and disadvantaged communities in Western Australia, Victoria, New South Wales and the Asia-Pacific region. Offerings include community mental health counselling and support through St John of God Mental Wellbeing Services and Midland Head to Health, specialist mental health support for new parents via St John of God Raphael Services, assistance for individuals with drug and alcohol dependence through the South West Community Alcohol and Drug Service and the Drug and Alcohol Withdrawal Network, and accommodation services for young people and adults experiencing or at risk of homelessness at St John of God Horizon House and Casa Venegas. Internationally, its health team collaborates with governments and health care providers in the Asia-Pacific region, notably supporting workforce capability development in Timor-Leste and operating the first drop-in centre for mental health issues in Papua New Guinea.

St John of God Accord:

- **Disability Support:** For over 65 years, St John of God Accord has made a difference in the lives of people with disabilities, specialising in supporting individuals with intellectual disabilities across all metropolitan regions of Melbourne. Services include support coordination, therapy services, individualised support, school leaver employment supports, disability employment services, short-term accommodation, supported independent living and Accord Plus (after-hours programs). In 2023-24, Accord supported 1,036 clients across 40 accommodation houses and 45 sites in Melbourne's northern, eastern, western and southern suburbs.

St John of God Health Care at Home:

- **At-Home Services:** This service provides compassionate and timely health care from 10 service delivery centres to individuals in their own homes following hospital stays, allowing them to continue receiving expert assistance while benefiting from familiar surroundings and the support of loved ones. In 2023-24, the service delivered more than 68,641 episodes of care. Services, available in metropolitan and regional Western Australia and Victoria, include after-hospital clinical care at home, postnatal home assistance for families who have recently welcomed a new baby, and rehabilitation in the home provided by therapists to help patients regain strength and endurance after treatment or surgery.

St John of God Foundation:

- **Philanthropic Efforts:** St John of God Health Care's fundraising and philanthropic arm, the St John of God Foundation, supports advancements in medical technology and research conducted at their hospitals. From the profound personal impact of tailored treatment to the far-reaching effects of leading medical research, the Foundation helps transform both individual patient experiences and community health outcomes across Australia.

Group Services and Corporate Functions:

- **Administrative Offices:** The organisation's corporate functions are primarily managed from its office on Wellington Street, Perth, with some functions overseen from Collins Street, Melbourne.

Our supply chain

St John of God Health Care continues to strengthen its commitment to maintaining a comprehensive and ethical supply chain to support its extensive health care and community services operations across Australia and New Zealand.

In 2024, St John of God Health Care continued to focus on supply chain resilience, ethical sourcing, operational efficiency and sustainability to ensure the delivery of high-quality patient care.

Supplier Expectations and Compliance

St John of God Health Care requires its suppliers and vendors to implement robust policies and processes that prevent modern slavery, uphold human rights and ensure ethical sourcing across all levels of the supply chain. As part of its ongoing commitment to ethical procurement, St John of God Health Care released an updated Code of Conduct, which extends its expectations to all third-party partners, reinforcing the organisation's zero-tolerance approach to modern slavery and unethical practices.

The organisation's Modern Slavery Statement outlines enhanced due diligence measures, comprehensive risk assessments and proactive supplier engagement strategies to ensure compliance. These measures include strengthened contractual requirements, mandatory supplier declarations and ongoing monitoring to identify and address potential risks.

Financial and Operational Overview

- **Financial Performance**
 - **Total Revenue:** The organisation reported a total revenue of approximately \$2.16 billion for the 2023-24 fiscal year, reflecting a 7% increase from the previous year.
- **Strategic Supply Chain Initiatives - Alignment with Strategic Plan:** St John of God Health Care's supply chain initiatives are integrated into its 2023–2025 Strategic Plan, emphasising sustainable procurement practices, high-quality service delivery and adherence to national best practices.
- **Operational Resilience**
 - **Adaptation to Challenges:** The organisation has implemented business continuity measures and risk management strategies to maintain uninterrupted services amidst challenges such as regulatory shifts, rising costs and fluctuating patient demand.

Key Sourcing Categories

St John of God Health Care procures a diverse range of products and services to support its hospital, community and disability services operations. The key procurement categories include:

Medical and Clinical Supplies

Pharmaceuticals and Medications

Medical Consumables (e.g., syringes, gloves, PPE, wound care products)

Surgical Instruments and Equipment

Diagnostic and Imaging Equipment

Patient Monitoring Systems

Health Care Technology and Digital Solutions

Medical Software and Patient Administration (PAS)

Clinical Decision Support Systems

Telehealth Platforms

Cybersecurity and Data Protection Solutions

Network and Infrastructure Services

Hospital and Facility Management

Medical Waste Management Services

Cleaning and Hygiene Products

Hospital Catering and Nutrition Services

Laundry and Linen Services

Utilities (Water, Energy, HVAC Systems)

Capital Equipment and Infrastructure

Hospital Beds and Patient Furniture

Building Construction and Maintenance

Facility Upgrades and Refurbishments

Medical Transport and Logistics

Corporate and Professional Services

Legal and Compliance Services

Human Resources, Recruitment and Labour Hire

Financial Services and Insurance

Marketing and Communication Services

Education and Training Providers

Social and Community Services Procurement

Community Mental Health Services

Aged Care and Disability Support Equipment

Emergency Response and Outreach Support

Housing and Accommodation Services for Vulnerable Populations

Sustainability and Ethical Procurement

St John of God Health Care is committed to sustainable sourcing, supplier diversity and responsible procurement practices by:

- Engaging with local and ethical suppliers to support social impact initiatives
- Reducing environmental footprint through eco-friendly hospital supplies and sustainable infrastructure solutions
- Ensuring fair wages and ethical labour practices across the supply chain.

By strengthening supply chain governance, enhancing risk management and prioritising sustainability, St John of God Health Care continues to deliver excellent health care while upholding the highest ethical and operational standards.

Over the past five years, St John of God Health Care has demonstrated steady growth in its procurement activities, contract management and supplier engagement. The data highlights key trends in procurement spend, supplier relationships and contract expansion.

Increase in Active Contracts:

The number of active contracts has steadily increased from 153 in 2020 to 476 in 2024, reflecting a strengthened approach to supplier engagement and long-term procurement strategies.

• Growth in Non-Payroll Procurement Spend:

Procurement expenditure has shown an upward trend, peaking at \$1.089 billion in 2022 before stabilising at \$987 million in 2024. This reflects a focus on strategic supplier partnerships and optimised procurement efficiencies.

• Supplier Engagement and Concentration:

The number of suppliers has gradually decreased from 4,800 in 2020 to 3,918 in 2024, indicating a more streamlined and focused supplier base. Despite the reduction in supplier count, the organisation continues to maintain long-term relationships, with most of its procurement spend (95-98%) remaining within Australia.

• Supplier Consolidation for Key Spending:

The top 179 to 190 suppliers account for 80% of total procurement spend each year, demonstrating a reliance on high-value, strategic supplier partnerships.

These trends reinforce St John of God Health Care's commitment to ethical and sustainable procurement, supplier resilience and operational efficiency, while maintaining a robust supply chain to support its health care operations.

Year	Active Contracts	Added Modern Slavery Terms To new and existing contracts (Cumulative)	Non-Payroll Procurement Spend (\$M)	Total Suppliers	Percentage of Spend in Australia (%)	Suppliers with 80% Spend
2020	153	-	760	4,800	98	179
2021	201	55	808	4,300	98	175
2022	284	65	1,089	4,266	97	175
2023	376	91	949	4,093	95	190
2024	476	298	987	3,918	95	180

Reporting Criteria 3

Modern slavery risks in our operations and supply chain

Operational risks

In 2024, St John of God Health Care identified and addressed several operational risks and implemented mitigation actions to maintain the quality and safety of its services.

Our Workforce

As a large and diverse organisation, we prioritise fostering a positive culture and investing in our caregivers to enhance their wellbeing, support their career development and enable delivery of outstanding patient care.

In May 2024, we proudly launched our Innovate Reconciliation Action Plan (RAP) 2024-2026, reaffirming our commitment to making a meaningful impact as a major health care provider in Australia. This RAP reflects our dedication to closing the gap in health outcomes for Aboriginal and Torres Strait Islander peoples while also enhancing their employment opportunities within our organisation.

Our Organisational Health, Safety and Wellbeing Strategy guides our efforts to support our caregivers. This year, we focused on:

- Developing a psychosocial risk management program to address the top five risks at each hospital or service, including a mental health strategy and a critical incident trauma response toolkit
- Continuing the rollout of the OHS risk program
- Enhancing support for caregivers returning to work after an injury or illness

- Implementing the Solv injury management system to support best practice injury management processes.

We place a strong emphasis on Formation across the organisation to ensure our culture aligns with our Mission and that we continue to deliver excellent and compassionate care. Formation enhances our caregivers' abilities to embody our Mission, Vision and Values in their interactions with one another and with those we serve.

Communication System Vulnerabilities

St John of God Health Care recognised potential risks associated with communication disruptions, which could affect service delivery. To mitigate this, the organisation implemented robust and automated call forwarding measures to ensure business continuity during both planned and unplanned network outages.

Compliance and Quality Assurance

An assessment of St John of God Health Care Hospitals revealed non-compliance with seven regulations, three of which were rated as critical risks. This highlighted the need for ongoing monitoring and improvement in compliance and quality assurance processes.

Data Transparency and Clinical Governance

To enhance transparency and clinical governance, St John of God Health Care improved the quality and safety data published on its website. This initiative aimed to align with national public reporting standards and provide detailed, hospital-level information across key clinical indicators.

Leadership in Risk Management

The appointment of a new executive leader for risk, safety, assurance and legal operations underscored St John of God Health Care's commitment to strengthening its risk management framework. This role involves collaboration across the organisation to enhance safety and compliance.

Financial Pressures

St John of God Health care faced financial challenges due to inflationary pressures and new IT investments, which required careful financial management to maintain operational stability.

Resource Constraints

Workforce shortages, particularly in specialised units like maternity wards, posed operational risks. For example, St John of God Geelong Hospital had to implement a temporary "birth bypass" due to several birth suite team members calling in sick, leading to a temporary halt in admissions to ensure patient safety.

By proactively identifying and addressing these operational risks, St John of God Health Care demonstrated its commitment to maintaining high standards of patient care and organisational resilience in 2024.

Supply chain risks

In 2024, St John of God Health Care identified several supply chain risks that could impact its operations.

Migrant Workers

Supply chain risks in Australia are increasingly tied to the challenges faced by displaced and migrant workers. Many workers, particularly those in agriculture, construction and hospitality, face exploitation through poor wages, unsafe conditions and lack of job security. Displacement, exacerbated by factors like automation and global market shifts leaves workers, especially those on temporary visas, vulnerable to job loss with limited access to social welfare. Migrant workers often face discrimination, isolation and uncertainty regarding their future in Australia, while employers exploit their vulnerabilities due to insufficient labour protections. Addressing these risks requires stronger policy reforms, better enforcement of labour rights and increased accountability from companies within the supply chain.

SJGHC addresses these challenges by having an expectation that our organisations will act as guided by our **Corporate citizenship** statement. As a responsible corporate citizen, we recognise that we do not and should not act in isolation of communities within which we operate. We therefore try to ensure our operational success goes hand in hand with embracing broader community and social wellbeing.

Global Supply Chain Disruptions

International events, such as slowdowns in major shipping routes like the Red Sea and Panama Canal, strained trade relations and ongoing geopolitical conflicts have led to significant global supply chain disruptions. These challenges have resulted in fluctuating fuel and material prices, intermittent product availability and overall uncertainty in the timely delivery of goods. Such disruptions pose risks to St John of God Health Care's procurement of essential medical supplies and equipment.

Ethical Sourcing and Compliance

St John of God Health Care is committed to ensuring that its suppliers operate without the use of slavery or forced labour. This commitment requires continuous monitoring and verification of suppliers' labour practices to maintain ethical standards across the supply chain.

Digital Transformation and Cybersecurity

The integration of digital technologies to improve hospital efficiency introduces risks related to data security and system reliability. Ensuring that digital systems are secure from cyber threats is crucial to maintaining operational integrity.

Supplier Negotiation Challenges

The St John of God proactively addresses supply chain risks to maintain resilience and ensure the continued delivery of high-quality health care services.

In 2024, we identified our highest risk suppliers according to the following risk indicators.



Industry Sector Risk

Certain industries have an inherently higher risk of modern slavery due to labour-intensive production, weak labour regulations and reliance on low-skilled or vulnerable workers. High-risk sectors include:

- Healthcare and medical supply chains (e.g., gloves, PPE, pharmaceuticals)
- Construction and building materials
- Cleaning and facility management services
- Textiles and uniforms
- Electronics and IT hardware
- Food and catering services.

Commodity/Product Risk

Some products and raw materials are more susceptible to modern slavery due to sourcing practices and labour exploitation. High-risk products include:

- Medical gloves and PPE (e.g., sourced from high-risk labour regions)
- Surgical instruments and medical devices (e.g., metals and components from high-risk regions)
- Uniforms and textiles (e.g., cotton from countries with forced labour issues)
- Electronics and IT (e.g., computers, servers, smartphones – linked to forced labour in mining for raw materials)
- Rubber, palm oil, seafood and cocoa (commonly associated with forced or child labour).

Geographic Location Risk

The country of origin of a supplier or product is a major determinant of modern slavery risk. Key risk factors include:

- Weak labour laws and enforcement
- Prevalence of forced labour and child labour
- Lack of corporate transparency and accountability

High-risk regions include:

- Asia-Pacific (e.g., China, Malaysia, Bangladesh, India, Thailand, Myanmar)
- Middle East and Africa (e.g., UAE, Qatar, Democratic Republic of the Congo)
- Latin America (e.g., Brazil, Mexico, Peru).

Workforce Profile Risk

St John of God recognises social economic and cultural aspects that could increase a worker's vulnerability, including but not exclusive to:

- Dangerous and hazardous work, isolation (work completed out of standard office hours with little or no supervision or engagement with direct workforce)
- Sham contracting, undeclared contracting, and subcontracting arrangements (lack of clarity on layers between principal employer and workers), low wage, little training, and competency threshold (also referred to as low-skill and/or unskilled work)
- Insecure work (with high levels of casual and zero hours contracts and low coverage of sick leave and support for injured workers)
- Workers with English as a second language (with low awareness of entitlements and rights;

these include students on visas, migrant workers and instances of Australian residents with Centrelink benefits working for cash in hand)

- Labour intensive work (quotas and work demand is often too high for the allocation of time and number of people), lack of transparency and consistency.

These vulnerabilities are present in operations and supply chains, with protection of workers central to our risk management program.

Recruitment and Labour Hire Risk

Modern slavery risks increase when recruitment practices are opaque or exploitative. Key risk factors include:

- Charging of recruitment fees (leads to debt bondage)
- Unclear contracts and lack of employment documentation
- Retention of passports or work permits by employers
- Restrictions on worker movement or freedom.

Supply Chain Complexity Risk

Modern slavery risks increase with greater supply chain complexity and lack of transparency. Key risk indicators include:

- Use of multiple subcontractors (higher risk of illegal subcontracting)
- Lack of traceability in supplier tiers (beyond Tier 1 suppliers)
- Limited supplier due diligence and reporting mechanisms.

Supplier Due Diligence and Compliance Risk

The effectiveness of supplier governance and compliance directly affects modern slavery risks. Key risk indicators include:

- No supplier code of conduct addressing modern slavery
- No independent social audits or third-party certifications
- Failure to remediate identified labour rights issues
- Lack of worker grievance mechanisms.

Publicly Reported Incidents and Whistleblower Risks

A supplier's track record in ethical labour practices is a strong risk indicator. Key risk factors include:

- Previous reports of labour violations or forced labour incidents
- Legal actions or fines related to worker exploitation
- Negative media coverage or NGO investigations.

The total spends for the 3,918 suppliers for whom the taxonomy risk assessment was completed amounts to \$987 million.

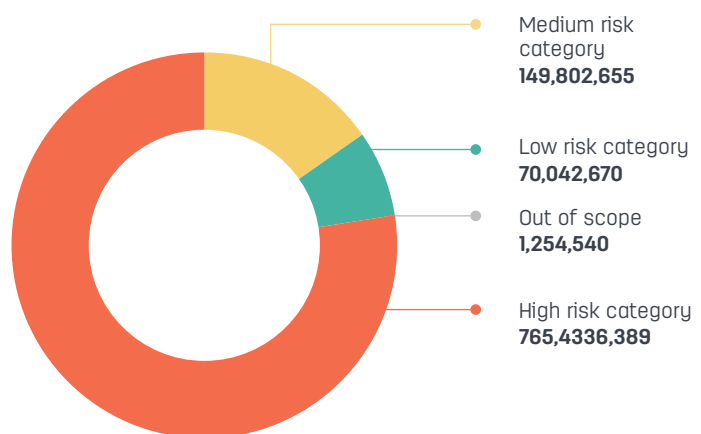
The category review and assessment presented the following for 2024:

We identified 27 high-risk spend categories that comprise 2,018 out of 3,918 suppliers.

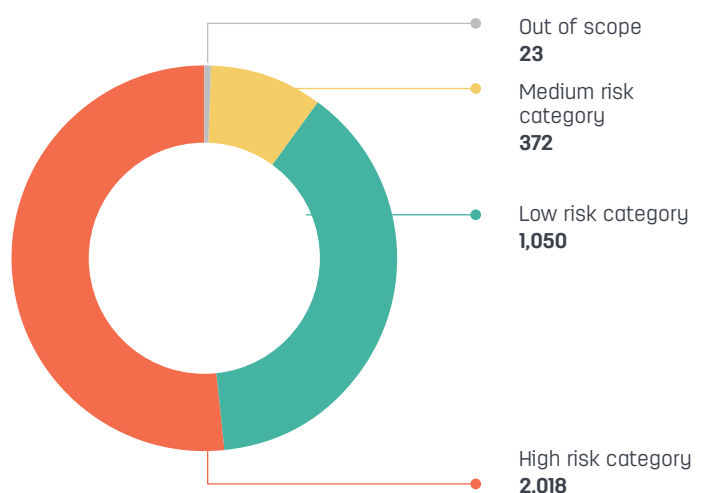
The 9 medium risk spend categories are comprised of 372 suppliers, and the 3 low risk spend categories comprise 1,505 suppliers.

One spend category is out of scope.

Annual spend by risk



Suppliers by risk



- High risk category
- Medium risk category
- Low risk category
- Out of scope category

Donations to St John of God Foundation

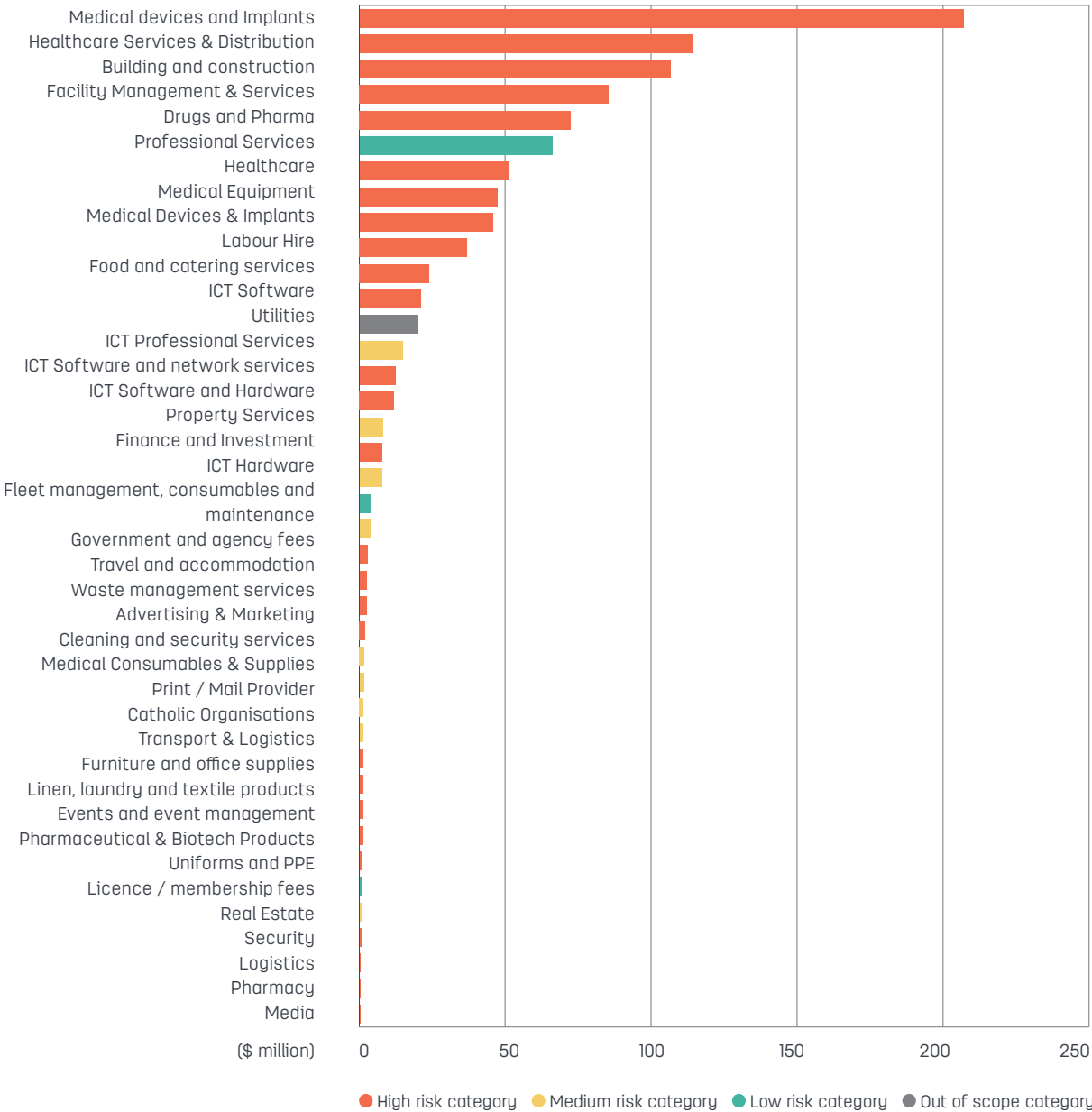
St John of God Health Care receives donations from members of the community and undertakes fund raising through St John of God Foundation.

We have a written procedure in place governing the acceptance, recording and acknowledgement of gifts. In addition to other things,

this outlines responsibilities if there is suspected unethical or socially irresponsible behaviour and specifically references modern slavery as an example of unacceptable behaviour.

We undertake due diligence on all gifts valued at \$10,000 or more.

Modern slavery risk by spend category



Reporting Criteria 4

Actions taken to assess and address risk

Modern slavery working group

St John of God Health Care maintains a dedicated Modern Slavery Working Group, comprising 11 representatives from key functional areas, including procurement and supply chain, workforce, legal, international health, corporate affairs, compliance, policy, and risk. This cross-functional collaboration ensures a comprehensive and integrated approach to addressing modern slavery risks across our operations and supply chains.

The group initially convened bi-monthly to establish governance structures and drive early-stage initiatives. As the program has matured, the meeting frequency has transitioned to an as-needed basis to allow flexibility while maintaining momentum. To enhance structure and accountability, we plan to implement a quarterly meeting schedule in the upcoming reporting period.

Partnered with other catholic health care and education providers

St John of God Health Care has actively engaged in several key partnerships to combat modern slavery:

- Australian Catholic Anti-Slavery Network (ACAN): We continued our collaboration with ACAN, leveraging their expertise to strengthen our anti-slavery initiatives. This partnership enhances our ability to assess and address modern slavery risks within our operations and supply chains.
- Catholic Network Australia (CNA) Joint Procurement Network (JPN): Our ongoing collaboration with the CNA JPN allows us to engage suppliers collectively, promoting ethical sourcing and procurement practices across the Catholic health and education sectors.
- Australian Catholic Religious Against Trafficking in Humans (ACRATH): Through our Formation team, we maintained our partnership with ACRATH, participating in events and initiatives to raise awareness about modern slavery and human trafficking within our communities.
- Catholic Mission: We continued our collaboration with Catholic Mission, contributing to their Christmas Reflection programs to highlight our anti-slavery efforts and support their community awareness initiatives.

These partnerships underscore our commitment to eradicating modern slavery and promoting ethical practices within our organisation and the broader community.

International day for abolition of slavery

As part of our ongoing commitment to raise awareness and foster a culture of ethical responsibility, St John of God Health Care marked the International Day for the Abolition of Slavery by reaffirming our zero-tolerance stance on modern slavery and reinforcing our dedication to ethical practices.

We shared this message across our social media platforms, underscoring our identity as a Catholic ministry that upholds the values of personal freedom and the intrinsic dignity of every person. Our communications acknowledged the often hidden and complex nature of modern slavery, particularly within supply chains, and highlighted our ongoing commitment to applying strong governance principles to identify and mitigate these risks.

To further support this message, we launched a video campaign outlining the actions we are taking to protect human rights and ensure that modern slavery prevention is embedded across our supply chains and partnerships.

Through continued education, awareness, and governance initiatives, we are cultivating an organisational culture rooted in ethical practice and committed to driving meaningful, lasting change.

Supplier Surveys and Engagement

As part of our continued commitment to modern slavery risk mitigation, St John of God Health Care actively engages with suppliers through surveys, assessments and capacity-building initiatives.

In collaboration with ACAN and CNA JPN, we expanded our previous supplier survey efforts to better understand procurement and sourcing practices across our supplier network. In 2024, we received 638 comprehensive responses, an increase from 427 in 2023. This increase demonstrates our enhanced supplier engagement efforts and a growing awareness of modern slavery risks.

Responses provided to the ACAN supplier survey identified that our suppliers buy products from 31 countries, 4 of those classified as high risk according to the Sedex country/region and sector pre-assessment tool.

In addition to sourcing profile information, in 2024 we gained visibility over our suppliers through undertaking a total of 18 SMETA audits through Sedex, which identified 81 non-conformances. The SMETA (Sedex Members Ethical Trade Audit) standard serves as a comprehensive framework for assessing a company's performance across key areas, including labour rights, health and safety, environmental practices and business ethics.

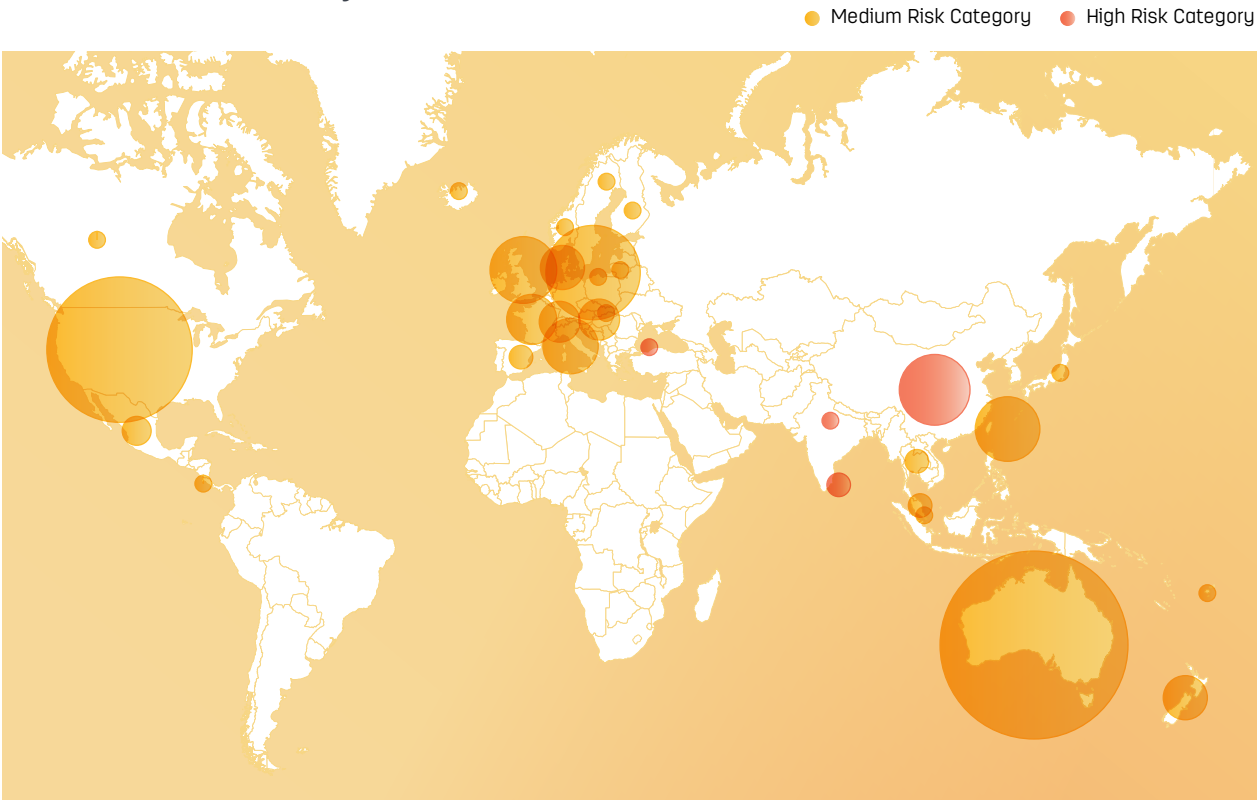
Audits provide an initial window into the real-world operations of suppliers, offering a preliminary but revealing view into their business practices. Audits can help us to understand how a supplier operates beyond what is promised or presented in formal documents and agreements by systematically evaluating and collecting evidence directly at the source. They also lay the groundwork for ongoing engagement and accountability.

Outcomes and findings related to non-compliances, worker interviews, document reviews, assessment of recruitment practices and subcontracting establish a baseline for measuring improvements and guiding future actions. While we recognise the limitations of auditing, it can help to detect practices that may lead to or cover up labour abuse and modern slavery, serving as both a preventive measure and a means of discovery.

We are planning the integration of audits into the risk management program during FY26.

Additionally, we increased our focus on high-risk categories, resulting in a significant rise in identified suppliers from 532 in 2023 to 2,018 in 2024. Our engagement through Sedex has also strengthened, with 143 suppliers invited to join, 121 joining and 102 completing Sedex Self-Assessment Questionnaires (SAQs) – a significant improvement from previous years.

Risk across the country



Through these efforts, St John of God Health Care continues to collaborate closely with suppliers to ensure ethical sourcing, transparency and alignment with best practices in modern slavery prevention.

Risk management and framework

As part of our ongoing commitment to strengthening modern slavery risk management, St John of God Health Care has continued to refine its risk assessment framework, now aligned to our entire supplier base of 3,918 suppliers.

Enhanced Risk Analysis

Following the extension of our risk assessment program, we undertook a more detailed analysis to improve visibility of supply chain risks. Key developments include:

- 638 suppliers provided detailed feedback via the ACAN Supplier Survey, up from 427 in 2023

- 2,018 suppliers were assessed within high-risk categories, a substantial increase from 532 in 2023

We also reviewed and updated our taxonomy risk assessment, which evaluates the full supplier base. This continuous improvement enables us to segment suppliers by risk level, informing targeted mitigation strategies and more focused supplier engagement.

Sedex Platform Engagement

To enhance transparency and collaboration, we continued to invite Tier 1 suppliers to engage via the Sedex platform. In 2024, 119 suppliers joined Sedex, a notable rise from 37 in 2023. While the majority now engage through Sedex, we maintain a flexible approach, with three key suppliers engaging with us outside the platform.

Supplier Risk Insights

122

Supplier sites have completed the Sedex Self-Assessment Questionnaire (SAQ)

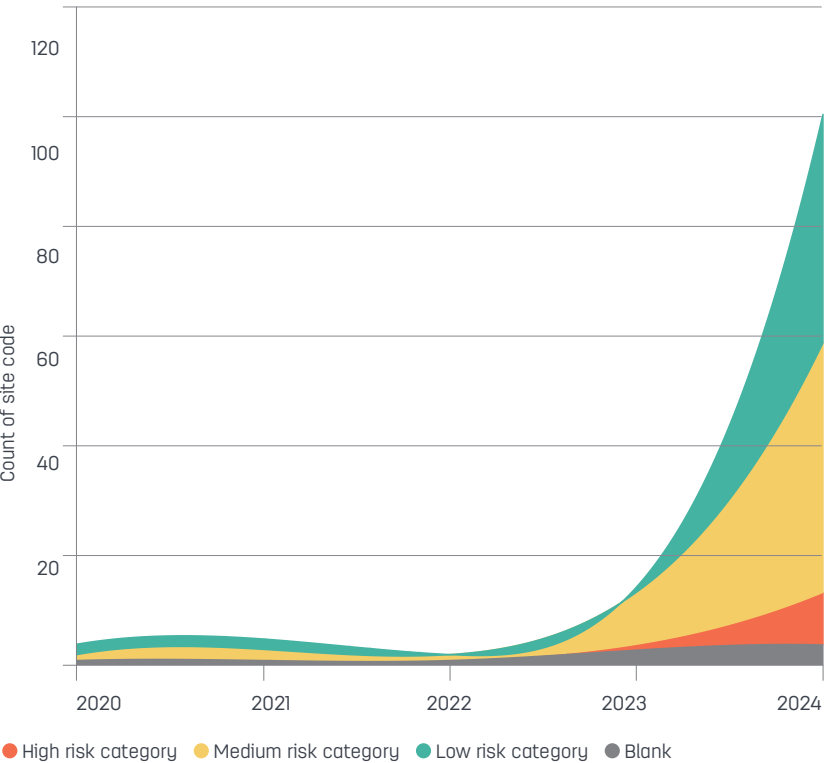
11

Suppliers have been flagged as high-risk, including those sourcing from high-risk countries, and will undergo desktop review

An additional 111 sites have been classified as low or medium risk on Sedex

We will continue to review and triangulate supplier data—including SAQ responses, audit results, and broader engagement activities—to ensure a robust, risk-informed approach to supplier management and modern slavery mitigation.

Count of Site code and First Country/Region by Year and Combined risk category



Case Study

Modern slavery response through desktop reviews

Overview: In 2024, the Hospitals Working Group commenced joint desktop reviews to enhance supplier engagement and management of modern slavery risk. The model introduced a clear review layer between supplier self-assessment and action planning to make supplier responses robust, risk-based, and outcome-driven on enhancing worker protection. The desktop review process validated supplier responses, resolved inconsistencies, identified areas of high risk, and enabled co-design of the next steps with the aim of strengthening worker protection.

The desktop reviews identified:

- Inconsistent reporting on the use of indirect labour – with undertakings to clarify labour hire practices and put in place appropriate protections for workers
- Determination of high-risk product and service categories – with suppliers being requested to outline risk reduction measures and make inclusion of workers' rights contractual
- Gaps in governance and public disclosures – with suppliers being requested to update documentation to include current anti-modern-slavery requirements and make verification of training data and due diligence outcomes available
- While grievance mechanisms were in place, their effectiveness was in doubt, and this led to calls for improved metrics and access
- Inconsistencies in remediation procedures were addressed through dialogue, and this led to commitments to develop or update frameworks to improve access and effectiveness of remediation.

Next Steps and Ongoing

Improvement Actions: Following the desktop reviews, suppliers were requested to clarify high-risk practices, increase worker participation through voice programs and grievance access, improve metrics and reporting on the success of actions implemented, and increase transparency and public disclosure to make sure that in-house practices and public statements are consistent. Ongoing collaboration in 2025 between suppliers and Catholic hospitals will focus on long-term, sustainable capacity building and knowledge sharing centred on risk mapping. The desktop reviews offered constructive dialogue and tailored subsequent steps, resulting in a better mechanism for managing risks of modern slavery and keeping workers' interests at the centre of approved activities.

Key Metrics

21

Desktop reviews scoped, 7 completed

5

Supplier meetings completed

20

Additional historical assessments shared with the Hospitals Working Group

By enhancing our risk assessment methodology and strengthening supplier collaboration, St John of God Health Care continues to advance its modern slavery risk mitigation strategy, ensuring a transparent, responsible and ethical supply chain.

Contract management

We executed new contracts and variations to existing contracts, including anti-slavery clauses for 298 of our suppliers. We continue to include the new anti-slavery provisions in new contracts through sourcing events and contract variations on existing contracts. We continued to review our templates to ensure compliance with modern slavery provisions.

Ethical sourcing guidelines

During the reporting period, we extended our ethical sourcing guidelines to 50 suppliers under blanket purchase order agreements, encompassing \$17.3 million of non-payroll expenditure. This initiative reinforces our commitment to responsible procurement practices and aligns with our dedication to ethical standards across our supply chain.

Environmental sustainability: Anaesthetic agent ban

In a significant move towards environmental sustainability, St John of God Health Care became the first Australian private health care organisation to cease the purchase of desflurane, a commonly used anaesthetic agent known for its substantial environmental impact. Desflurane

has a global warming potential 2,540 times greater than carbon dioxide. This decision, effective from March 2024, is projected to reduce our carbon dioxide emissions by approximately 260 tonnes annually.

This action aligns with our Environmental Sustainability Strategy, demonstrating our commitment to reducing our carbon footprint and promoting sustainable practices within the health care sector. Our collaboration with anaesthetists to transition to environmentally friendly alternatives underscores our dedication to both patient care and environmental stewardship.

These initiatives reflect our ongoing efforts to integrate ethical sourcing and environmental sustainability into our operational framework, ensuring that our practices benefit both the communities we serve and the planet.

Code of conduct

In 2024, St John of God Health Care reaffirmed its commitment to ethical business practices and human rights by enhancing its Code of Conduct. The updated Code reinforces the expectation that caregivers, suppliers and stakeholders uphold the highest standards of integrity, ethical behaviour and compliance with modern slavery prevention measures. This revision strengthens our dedication to transparency, accountability and responsible practices across all aspects of our operations and partnerships.

Regular Review and Accessibility

The Code of Conduct is reviewed regularly to reinforce expectations around ethical behaviour, sustainability and human rights compliance. It is available on both internal and external platforms, ensuring transparency and accessibility for caregivers, suppliers, patients and community members engaging with St John of God Health Care.

Enhancements in Ethical Governance

The latest update to the St John of God Health Care Code of Conduct includes provisions focused on providing care and services for children, young people and adults at risk. This update strengthens our commitment to safeguarding vulnerable individuals within our organisation and the communities we serve.

Guiding Principles and Responsibilities

The Code of Conduct outlines the minimum standards and behaviours required of all St John of God Health Care caregivers. It promotes fairness, respect and ethical decision making while aligning with our Mission, Vision and Values. The Code eliminates ambiguity regarding acceptable workplace and procurement practices, reinforcing compliance with modern slavery prevention measures and ethical governance across all areas of operation.

Commitment to Transparency and Continuous Improvement

The Code of Conduct is publicly available on our website, ensuring transparency and accountability for all stakeholders. As a living document, it undergoes regular review and updates to reflect evolving risks, best practices and emerging regulatory requirements in ethical governance and human rights protection.

Zero-Tolerance Approach to Exploitation and Abuse

At St John of God Health Care, we maintain a zero-tolerance approach to all forms of exploitation, abuse, and unethical labour practices. This principle is embedded across our operations and forms a cornerstone of our ethical commitment.

All caregivers and stakeholders are expected to familiarise themselves with and uphold our Code of Conduct, which outlines clear responsibilities in preventing abuse and ensuring ethical behaviour. The latest updates to the Code emphasise our duty of care to Aboriginal and Torres Strait Islander peoples, individuals with disabilities, culturally and linguistically diverse (CALD) communities, those experiencing homelessness, and people of diverse sexuality and gender.

Through the consistent application of our Code of Conduct, we continue to embed strong ethical standards, reinforcing our commitment to human rights, ethical sourcing, and social responsibility across all levels of the organisation.

Modern slavery policy

As part of St John of God Health Care's commitment to combating modern slavery, an annual review of the Modern Slavery Policy was completed in December 2024. This review ensured that the policy remains aligned with evolving regulatory requirements, industry best practices and organisational priorities.

The Modern Slavery Policy consists of a comprehensive framework that includes:

- **The Policy:** Outlining St John of God Health Care's commitment to eradicating modern slavery, ethical sourcing expectations, and compliance with relevant laws and regulations
- **Procedures:** Providing clear guidance on risk assessment, due diligence and reporting mechanisms to identify, manage and mitigate modern slavery risks within the organisation and its supply chain
- **The Modern Slavery Toolkit:** Equipping caregivers and stakeholders with practical tools, templates and resources to support compliance, risk identification and supplier engagement.

During the 2024 review period, updates were identified and incorporated to align the policies with organisational changes.

Ongoing Modern Slavery Training and Awareness

To maintain awareness and compliance with modern slavery standards across key areas of St John of God Health Care, we have continued our comprehensive training program throughout 2024. In total, 93 key members from procurement and supply chain, facilities management, and other identified departments participated in this program.

The five Modern Slavery eLearning modules remain available on our Learning and Development platform (LMS), providing ongoing access for caregivers to engage in training as part of their professional development.

For new members joining the Modern Slavery Working Group, essential training modules, including Modern Slavery 101, Business Readiness, and Grievance Mechanisms and Remedy, were completed via Workday LMS. This ensures that all working group members are equipped with foundational knowledge and practical skills to address modern slavery risks effectively.

Additionally, Modern Slavery 101 has been made a mandatory course for all caregivers within the organisation. This foundational training, delivered via LMS, ensures that all caregivers understand how to identify, manage, and mitigate modern slavery risks, further reinforcing our commitment to ethical standards and compliance across all operations.

Capacity building

The Australian Catholic Anti-Slavery Network (ACAN) actively engages suppliers through regular webinars aimed at enhancing awareness of modern slavery risks and compliance requirements. These webinars cover topics such as the mission and vision of Catholic entities, identifying risks

within supply chain operations, understanding relevant modern slavery legislation, and clarifying supplier expectations from Catholic customers and buyers.

One hundred and twenty staff members from our invited suppliers participated in the capacity-building webinars hosted by ACAN.

Governance and reporting

St John of God Health Care continued to enhance its governance and reporting mechanisms to effectively identify and address modern slavery risks within its operations and supply chain.

Key initiatives included:

- **Reporting Framework:** We maintained standardised, regular reporting to the Board Audit and Risk Committee (ARC), ensuring rigorous scrutiny and oversight. Our reporting framework provides detailed insights into expenditure, risk assessments and contract management, by supplier and category. We are committed to further refining this framework to enhance its effectiveness in identifying and mitigating modern slavery risks.
- **Risk Identification:** We proactively highlighted and addressed specific risks as they were identified within our supply chain, reinforcing our commitment to ethical practices.
- **Grievance and Whistleblowing Mechanisms:** Aligned with our zero-tolerance stance on modern slavery, we actively monitored our grievance and whistleblowing platforms. This approach ensured that concerns raised by internal or external parties were addressed promptly, providing a safe and confidential avenue for individuals to report issues, thereby upholding the highest standards of ethical conduct across our operations.

These measures underscored our dedication to ethical governance and our proactive approach to combating modern slavery.

Vendor onboarding

As part of our transition to a new Enterprise Resource Planning (ERP) system, we revisited and refined our vendor onboarding process to strengthen compliance, risk management and transparency in supplier engagement.

- **Enhanced Onboarding**

Processes: We re-assessed and refined the documentation and workflows for onboarding new vendors. The onboarding process now links to the St John of God Health Care Supplier Code of Conduct and our standard terms and conditions for supplying to St John of God Health Care, reinforcing our commitment to ethical sourcing and responsible procurement.

- **Stronger Supplier Commitments**

Enhancements: Modern slavery commitments will form an integral part of our supplier onboarding process, ensuring alignment requirements for suppliers to adhere to ethical sourcing and human rights obligations. All new suppliers will be required to acknowledge and comply with St John of God Health Care's modern slavery commitments as a required condition of onboarding. This ongoing review will further strengthen our ability to identify, assess and mitigate risks across our supply chain while reinforcing compliance with national regulatory expectations.

- **Risk Identification and Mitigation:**

As part of our business-as-usual operational review activities, we identified and addressed potential risks associated with vendor management and took proactive measures to mitigate

them. During this process, we identified one vendor that posed a risk to the organisation. This risk was swiftly addressed through engagement and direct discussions, leading to appropriate actions being taken to ensure compliance with our ethical standards. These ongoing risk assessments and mitigation efforts reinforce our commitment to responsible procurement practices and help strengthen our supply chain governance.

- **Improved Compliance Tracking:**

We are refining the storing and tracking of certifications and relevant compliance documentation within the new ERP system to enhance data accuracy, accessibility and due diligence measures.

These enhancements ensure that modern slavery considerations remain embedded in our procurement processes, further strengthening our supply chain governance and ethical sourcing framework.



Modern slavery action plan and roadmap

Action plan

We have a multi-year roadmap with an action plan in place, which outlines initiatives across due diligence, monitoring and reporting, training and awareness-raising, risk management and compliance and communication.

Year	Focus Area	Key Actions & Progress
2025 & Beyond (Year 7 – Setting New Standards)	Sustaining Change	– Embed modern slavery practices into Core Business Strategy – Implement monitoring tools to assess supplier risks using AI and data analytics – Expand direct supplier mapping, training and capacity building beyond Tier 1 suppliers to include Tier 2 and Tier 3 suppliers – Expand direct supplier audits beyond Tier 1 suppliers to include Tier 2 and Tier 3 suppliers – Strengthen collaborations with ethical sourcing organisations to enhance responsible procurement – Develop remediation protocols for suppliers found in breach of ethical labour standards – Pilot ethical procurement certifications for high-risk supplier categories – Introduce modern slavery awareness modules in St John of God Health Care’s caregiver onboarding and professional development programs.
2024 (Year 6 – Maturity & Effectiveness Improvement)	Strengthening Governance & Risk Mitigation	– Strengthened our commitment to ethical supply chain practices and modern slavery prevention. We will continue refining our approach in key areas. – Communication and awareness – Enhanced and expanded our awareness campaign to improve stakeholder engagement and understanding – Strengthened Supply Chain Risk Management Supplier Engagement: – Engaged with 638 suppliers to review, assess and develop risk mitigation plans where necessary Sedex Platform Integration: – Expanded supplier onboarding via Sedex, with 121 new suppliers joining – Support 122 suppliers in completing Self-Assessment Questionnaires (SAQs) Social Audits and Corrective Actions: – Conducted 18 supplier social audits to assess compliance and ethical practices – Implemented 81 corrective actions based on Sedex assessments and self-audits – Contract Review and Compliance – Integrated modern slavery terms into 298 contracts and variations, including 50 ethical sourcing declarations under blanket purchase agreements – Governance and Risk Alignment – Reclassified our assessment taxonomy to align with ACAN recommendations, now covering 40 spend categories for better risk assessment and monitoring – Training and Capability Building – Provided modern slavery awareness training to 120 suppliers’ staff – Maintained internal training for 93 caregivers to provide ongoing awareness and compliance – Continuous Improvement – Maintain and expand existing activities to drive maturity and effectiveness across our ethical sourcing and modern slavery prevention efforts.

Year	Focus Area	Key Actions & Progress
2023 (Year 5 - Effectiveness Review & Monitoring)	Continuous Improvement & Supplier Risk Management	– Improved and enhanced campaigns to improve communication and awareness – Refined our supplier engagement and communication approach – Continued to rollout modern slavery training to 89 caregivers at St John of God Health Care – Continued to add modern slavery clauses into new agreements (Tier 1 supplier, across key categories) – Set the Modern Slavery 101 training as compulsory for key procurement and supply chain, facilities management and selected teams via the Learning and Development platform – Reviewed and updated Business Maturity Assessment – Reviewed approach/framework – Reviewed our modern slavery policies and procedures – Improved supplier engagement across the high impact categories – Collaborated and leveraged the knowledge gain from engaging with ACAN, CNA and our Healthcare Forum peers to improve visibility of supply chain risks.
2022 (Year 4 - Effectiveness Review & Monitoring)	Operationalisation & Risk Monitoring	– Improved supplier agreement and RFx templates to include modern slavery clauses – Added modern slavery clauses into new agreements (Tier 1 supplier, ICT and PPE categories) – Reviewed all ACAN modern slavery training program modules and added all available modules to St John of God Health Care Learning and Development platform – Reviewed and updated Business Maturity Assessment – Review approach/framework – Reviewed Change Impact Assessment – Invited top 50 suppliers to the Sedex platform – Reviewed policies and procedures – Extended Taxonomy Risk Assessment to all active suppliers – Reviewed goals, targets and KPIs – Partnered with ACRATH, CAN, ACAN, Catholic Health and Catholic Missions to communicate the potential impact of and collaborate with them on modern slavery risks in our supply chains.
2021 (Year 3 - Extend & Involve)	Implementation & Supplier Engagement	– Updated supplier agreement and RFx templates to include modern slavery clauses – Added modern slavery clauses into new agreements (Tier 1 supplier, ICT and PPE categories) – Reviewed ACAN Modern Slavery 101 training program and added all available modules to St John of God Health Care Learning and Development platform – Reviewed and updated Business Maturity Assessment – Reviewed approach/framework – Reviewed Change Impact Assessment – Added the top 25 suppliers to the Sedex platform – Reviewed policies and procedures – Extended risk assessment beyond Tier 1 suppliers – Reviewed goals, targets and KPIs – Partnered with ACRATH to communicate the impact of modern slavery in our supply chains.
2020 (Year 2 - Approach Development)	Framework & Policy Development	– Conducted a risk assessment and gap analysis – Developed the Modern Slavery Policy and aligned it with existing policies (investment, donations, whistleblower) – Initiated supplier contract reviews, focusing on top 50 suppliers. – Integrated Modern Slavery commitments into vendor onboarding processes – Added modern slavery clauses to agreement and procurement templates.
2019 (Year 1 - Awareness & Mobilisation)	Establishing Foundations	– Formed a Modern Slavery Working Group – Reviewed obligations under the Modern Slavery Act – Engaged with Catholic peer and industry groups – Launched the first communication and awareness campaign – Identified top-tier suppliers and commenced supplier engagement – Published the Supplier Code of Conduct on the St John of God Health Care website – Prepared and submitted the first Modern Slavery Statement.

Reporting criteria 5

Effectiveness assessment

At St John of God Health Care, we continuously strengthen our governance, risk management, and due diligence processes to mitigate modern slavery risks. Our Audit and Risk Committee (ARC) plays a key role in reviewing identified risks, ensuring compliance and overseeing mitigation measures across our operations and supply chain.

To ensure continuous improvement and accountability, we assess our actions against key performance indicators (KPIs) and external supplier engagement metrics. This structured approach enables us to track progress, enhance supplier engagement and refine our risk assessment frameworks.

These enhancements reflect our proactive approach to supplier engagement, enabling us to strengthen governance, transparency, and risk management in addressing modern slavery concerns across our supply chain.

Supplier Survey Engagement & Key Metrics

ACTIVITY	2023	2024
Total number of suppliers	4,095	3,918
Number of suppliers with visible contact information and ABN	2,753	3,918
Number of suppliers across high-risk categories	532	2,018
Number of ACAN Supplier Surveys completed	427	638
Supplier staff attending capacity-building webinars	122	120
Corrective actions identified	1	81
Individual staff completed e-learning	89	93
E-learning modules completed	202	97
Invited to join Sedex	25	159
Joined Sedex	37	121
Sedex SAQ completed	14	122
Social audits	5	18
Corrective actions as result social audits	1	81
Individuals identified or referred for modern slavery assessment	0	0

For this reporting period, we assessed the effectiveness of our actions against the following key process indicators:

2024 Key Performance Indicators (KPIs) & Supplier Engagement

Indicator/Target	Achieved
Total number of suppliers	✓
Number of suppliers with visible contact information and ABN	✓
Number of suppliers across high-risk categories	✓
Re-assessed business maturity using ACAN's proposed maturity scoring methodology	✓
Extended the Supplier Risk Assessment across the spend range of suppliers and categories	✓
Included modern slavery contractual terms across all new and renewed supplier contracts	✓
Number of ACAN Supplier Surveys completed	✓
Supplier staff attending capacity-building webinars	✓
Invited to join Sedex	✓
Joined Sedex	✓
Sedex SAQ completed	✓
Conducted social audits	✓
Corrective actions implemented	✓
Continued partnership with ACRATH to enhance awareness on modern slavery	✓
Renewed partnership with ACAN and CNA for a further term	✓
Reviewed and updated modern slavery policies and procedures	✓
Expanded partnerships with University of Notre Dame, Catholic Mission, and Health on key initiatives	✓
Conducted a detailed risk assessment across key suppliers	✓
Improved spend and taxonomy category spend visibility	✓
Maintained and communicated awareness on modern slavery principles and key events during the period	✓
202 eLearning modules completed by staff	✓
Invited new members to join the modern slavery working group	✓
Supplier Management Mitigation Action 1 – Engaged directly with high-risk suppliers to implement corrective actions and compliance measures	✓
Added modern slavery terms to existing and new contracts	✓

ACAN introduce new maturity score methodology

The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars:

- **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
- **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
- **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
- **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
- **Entity's Program and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
- **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

In line with best practice and reporting requirements, the maturity is measured across governance, risk assessment, risk management and effectiveness measures.

St John of God overall maturity has improved by 9% for 2024.

The analysis by pillar for the 2024 maturity assessment using the maturity scorecard is presented below:

Pillar	A	B	C	D	2024	
	Governance	Risk Assessment Operations	Risk Management Supply Chain	Effectiveness of Actions	Maturity Score	Improvement by Pillar
1. Business Process and Governance	●	●	●	●	●	3%
2. Operations	●	●	●	●	●	19%
3. Supply Chain	●	●	●	●	●	Achieved
4. Worker Engagement	🕒	●	🕒	●	🕒	8%
5. Entity's program and activities	●	●	●	●	●	2%
6. Grievance Mechanisms and Remediation	●	●	●	🕒	●	-3%
Grand Total	●	●	●	●	●	
Maturity Overall Improvement	-4%	8%	17%	16%	9%	9.20%



Remediation

St John of God Health Care provides several avenues for individuals to raise grievances or provide feedback to the organisation, both internally and externally focused. These channels are designed to ensure that concerns are addressed effectively and in a timely manner. The channels extend to feedback forms, online feedback surveys and a comprehensive whistleblowing policy to foster a culture of integrity and accountability.

St John of God Health Care is committed to addressing all feedback with seriousness and urgency, aiming to resolve concerns efficiently and improve the quality of care provided.

Domus 8.7 - A Modern Slavery Remediation Service

Purpose

Domus 8.7 prioritises safety, consent and support for victim survivors. This includes crisis support, referrals and case management that seeks to address the harms the victim survivors have experienced. Domus 8.7:

- Provides direct support to victim survivors and provides guidance to Catholic entities participating in the ACAN Program
- Provides strategic guidance, technical assistance and resources to equip Catholic entities to prevent, identify and remediate modern slavery
- Is guided by the principles of collaboration, flexibility and ethical standards, designed to support Catholic entities and victim survivors.

Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020. Catholic entities participating in the ACAN Program are the founding members of Domus 8.7.

Remediating Modern Slavery – An Organisational Imperative

The Modern Slavery Act mandates proactive efforts to identify, prevent, mitigate and address the impacts of modern slavery. When an organisation encounters instances of people impacted by modern slavery, the organisation has a responsibility to provide effective remediation. This involves steps to restore the victim survivors to their pre-exploitation state as much as possible.

Forms of Remedial Actions

Remedial actions vary on a case-by-case basis, and may include:

- Transport, accommodation and crisis support
- Services to address psychological and physical impacts
- Financial or non-financial compensation
- Offering alternative employment opportunities
- Payment of wages and entitlements
- Reimbursement of unfair recruitment and other fees
- Training to support new employment opportunities.

Reporting criteria 6

Process of consultation with owned or controlled entities

St John of God Health Care emphasises a comprehensive consultation process to ensure effective communication and collaboration across all levels of the organisation. This structured engagement ensures that key stakeholders actively contribute to decision making, governance and strategic direction.

Key Consultation Channels:

- **Executive Committee:**
Regular meetings are held to review organisational strategies, operational performance and risk management initiatives to maintain alignment with St John of God Health Care's Mission and objectives.
- **Audit and Risk Committee (ARC):**
The ARC conducts in-depth reviews of risk management approaches, compliance measures and internal controls, ensuring governance best practices are upheld.
- **Board of Directors and CEOs of Affiliated Entities:**
Engagement with leadership teams ensures that strategic decisions align with St John of God Health Care's Mission, Vision and Values, fostering consistency across the organisation.
- **Key Operational Teams:**
Consultation with procurement, supply chain, legal, frontline caregivers and other operational units ensures that policies and procedures are practical, effective and aligned with industry standards.

- **Controlled Entities:**
Regular meetings, working groups and review sessions with stakeholders from controlled entities facilitate collaboration, ensuring shared concerns, updates and continuous improvement initiatives are addressed.
- **Mission Integration Unit:**
The Mission Integration Unit ensures that all consultation processes are rooted in St John of God Health Care's Mission, Values and Catholic identity. This unit plays a vital role in:
 - Embedding mission-driven decision making across governance and operational processes
 - Providing ethical guidance in strategic and policy discussions
 - Ensuring that consultation efforts reflect the principles of human dignity, social justice and respect in line with St John of God Health Care's core Mission.

This structured consultation process fosters a unified approach to decision making, ensuring that strategies and initiatives are comprehensive, well-informed and effectively implemented across all entities within St John of God Health Care.

In 2024, St John of God Health Care reinforced its unwavering commitment to combating modern slavery through several key initiatives that focused on awareness, advocacy, and collaboration.

Public Commitment to Ethical Practices

On 2 December 2024, coinciding with International Day for the Abolition of Slavery, St John of God Health Care publicly reaffirmed its zero-tolerance stance against modern slavery. The organisation emphasised its ongoing dedication to upholding ethical practices across all aspects of its operations, including within supply chains and community engagements. This commitment highlights the organisation's foundational values of human dignity and social responsibility.

Engaging Stakeholders and Building Awareness

St John of God Health Care actively engaged with key stakeholders in efforts to raise awareness and drive systemic change. A significant event was the gathering hosted by the Archdiocese of Perth and the West Australian Catholic Migrant & Refugee Office, in partnership with the Australian Catholic Anti-Slavery Network (ACAN). The event featured survivor advocate Moe Turaga, whose personal testimony underscored the importance of strengthening support pathways for those affected by modern slavery.

Collaborative Efforts with ACAN

In 2024, St John of God Health Care contributed to the creation of the 2023 Compendium of Modern Slavery Statements, published by ACAN. This compendium provides a comprehensive overview of procurement spending across Catholic organisations and serves as a critical tool for identifying and addressing modern slavery risks within operations and supply chains.

Advocacy for Policy Change

The organisation actively supported several advocacy efforts aimed at influencing public policy to improve support for

modern slavery survivors. One notable initiative was endorsing a manifesto that provided practical recommendations for the incoming government to enhance safety, services, and long-term support for victims of modern slavery and human trafficking.

Support for the Australian Anti-Slavery Commissioner

In collaboration with ACAN, St John of God Health Care expressed strong support for the establishment of the Australian Anti-Slavery Commissioner role. This role is seen as critical to advancing national efforts to combat modern slavery. ACAN endorsed the Modern Slavery

Amendment (Australian Anti-Slavery Commissioner) Bill 2023, calling for the Commissioner to be endowed with adequate budget, authority, and functions to enforce modern slavery reporting requirements across government, business, and not-for-profit sectors. As an active member of ACAN, St John of God Health Care fully aligned with this advocacy, supporting the establishment of the Commissioner.

These initiatives reflect St John of God Health Care's steadfast commitment to ethical leadership and proactive engagement in combating modern slavery within its operations and the broader community.



Reporting criteria 7

Other Information

In 2024, St John of God Health Care reinforced its unwavering commitment to combating modern slavery through several key initiatives that focused on awareness, advocacy, and collaboration.

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