



Little Company of Mary Health Care Ltd

Modern Slavery Statement 2023

Disclosure Note

This statement has been made on behalf of Little Company of Mary Healthcare Ltd. This Statement covers all entities owned or controlled by Little Company of Mary Healthcare Ltd.

ABN 11 079 875 697

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About us

Calvary has provided healthcare to the most vulnerable Australians, including those reaching the end of their life, since the arrival in Australia of the Sisters of the Little Company of Mary in 1885. We are a charitable Catholic not-for-profit organisation operating across seven states and territories in Australia with 13 public and private hospitals, 62 residential aged care homes, 17 retirement living villages, and 17 home care centres.

The Spirit of Calvary expresses how we care for each other, and how we care for our patients, our residents and our clients by 'Being for Others'.

- Everyone is welcome
- You matter. We care about you.
- Your family, those who care for you, and the wider community we serve, matter.
- Your dignity guides and shapes the care we offer you.
- Your physical, emotional, spiritual, psychological and social needs are important to us.
- We will listen to you and to those who care for you.
- We will involve you in your care.
- We will deliver care tailored to your needs and goals.
- Your wellbeing inspires us to learn and improve.



Our Vision and Values

As a Catholic health, home care and aged care provider, our vision is to excel, and to be recognised as a continuing source of healing, hope and nurturing to the people and communities we serve.

We bring the healing ministry of Jesus to those who are sick, dying and in need through "Being for others":

- in the Spirit of Mary standing by her Son on Calvary;
- through the provision of quality, responsive and compassionate health, community and aged care services;
- based on Gospel values; and
- in celebration of the rich heritage and story of the Sisters of the Little Company of Mary.

Our Values are visible in how we act and treat each other. We are stewards of the rich heritage of care and compassion of the Little Company of Mary. We are guided by the values of Hospitality, Healing, Stewardship, and Respect.

Modern Slavery: Our Approach

Our approach to modern slavery is grounded in our understanding of human dignity, in our understanding of the value of human work, of justice, and the respect of human rights. The Church teaches us of the sanctity of human life, that each person is precious, and that we all have a responsibility to fight against the violation and degradation of our brothers and sisters. We believe that modern slavery rejects this principle, and shows instead a contempt for human beings. For this reason, elimination of this scourge is a present concern of the Catholic Church and, therefore, of Calvary.

Consistent with our values of hospitality, healing, stewardship and respect, Calvary is committed to upholding human rights, not only with respect to its own employees, and the people we engage with daily, but also for the workers in our operations and supply chain. We believe our responsibilities as a Catholic, charitable organisation focussed on delivering the best possible care, extend to victims of modern slavery, who may exist in our supply chains and operations.

This approach is enforced by our Ethical Sourcing Policy, Code of Business Practice, and our Business Partner's Criteria, which extend throughout the business to staff and suppliers.

2023 in Review

In fighting the scourge of modern slavery, we believe that the business community needs to continually review and improve on our response to changing environments. Our 2021 gap analysis revealed areas of significant progress in identifying risks, and equipping our staff with the necessary tools to address them on the ground. Simultaneously, we also identified areas of improvement and growth, particularly enhancing communication with suppliers, which support the entire Calvary network. Consequently, we are exploring the integration of technology and automation in our systems, collaborating with our third party provider of supply chain transparency solutions, Sedex. The process of onboarding suppliers to Sedex is progressing as planned. Additionally, through the Australian Catholic Anti-Slavery Network (ACAN) we have been actively engaging with other Catholic entities to foster joint communication and leverage the strength of our network through collaboration.

Calvary's modern slavery risk management initiatives can be split into three broad categories:

- Risk identification and mitigation in our internal operations and supply chain
- Staff awareness through education and training
- Demonstrating our commitment through internal policies and procedures.

In 2023, we continued to work with our suppliers, hosting information sessions and ensuring compliance of new and renewed contracted suppliers to Calvary's ethical business practices. We also identified an opportunity to improve on data collection so as to improve our ability to monitor compliance.

We build on the capability of our staff, requiring more staff to complete our online modules, and hosting training and information sessions for procurement staff throughout the Calvary network.

We launched a review of our internal policies and procedures, which strengthened our contracts, primarily with recruitment companies, in response to a significant risk presented in the use of third party workforce. In 2024, we are aiming to complete this review and strengthen and simplify our policies.

Our Plans for 2024

In 2023, we have been building our automation capabilities, which in 2024 will offer much stronger tracking and data. This includes:

- Continuation of our long-term road map, to strengthen our risk management of our supply chains.
- We plan to substantially increase our ability to survey suppliers, through automation, allowing us to build a much stronger picture of our risk.
- Expanding our program with a greater number of our suppliers who operate in high risk sectors, and bring in new suppliers in Sedex.
- Continue with the development of a whistle-blower hotline for workers, contractors, and sub-contractors.
- Building our staff awareness initiatives, through additional training and materials, particularly on grievance mechanisms and remedy pathways.
- Continuously review the effectiveness of our actions in addressing the risk of modern slavery.

Our Plans Beyond 2024

Beyond 2024, Calvary will:

- Continuously improve our due diligence in modern slavery risk management, encouraging our supply base to improve their risk management programs.
- Conduct random audits of high risk suppliers.
- Expand our supply chain mapping and update our risk profile, expanding our modern slavery program accordingly.
- Roll out our governance and process into an online supplier platform to capture more suppliers in our risk mitigation.
- Monitor and report on adherence to our ethical sourcing policy and documents.

Statement from Martin Bowles, National CEO,
Little Company of Mary Health Care Limited



I'm proud to present Calvary's fourth Modern Slavery Statement, in line with the *Modern Slavery Act 2018*, which outlines the steps we have taken to identify and mitigate the risk of modern slavery in our supply chain and operations.

Throughout 2023, supply chain issues continued to challenge us, compounding with significant workforce shortages, which will likely remain an issue for businesses over the coming years. These present a significant risk to our business, as the products and services that support Calvary are often critical, and occasionally lifesaving.

Product shortages often create new modern slavery and forced labour risks for our teams to predict and manage. I am proud to say that we have continued to develop and build on our approach to modern slavery with the key initiatives we have taken this year:

- Increased the number of staff trained in modern slavery risk management
- Built on past year's Supplier Assessment Questionnaires, and remedy pathways for suppliers, which do not meet our expectations
- Increased our level of industry coordination through our membership with the ACAN.

Our Mission is to bring the healing ministry of Jesus to those who are sick, dying and in need through 'Being for others'. We maintain this year, as we have in prior years, that this responsibility extends to the people who support us, in our operations and supply chain. We cannot be an organisation dedicated to healing knowing the possible harm we are causing to people working in our supply chains.

This Modern Slavery Statement has been approved and endorsed by Little Company of Mary Health Care Limited Board of Directors as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 26th June 2024 and is for the period 1 January 2023 to 31 December 2023. This modern slavery statement is signed by a responsible member of the Board of Directors as defined in the Act.

Handwritten signature of Mr Jim Birch AM in black ink.

Mr Jim Birch AM
Chair, Little Company of Mary Health Care

Handwritten signature of Mr Martin Bowles AO PSM in black ink.

Mr Martin Bowles AO PSM
National CEO, Calvary

Reporting Criteria 1 & 2: About Calvary

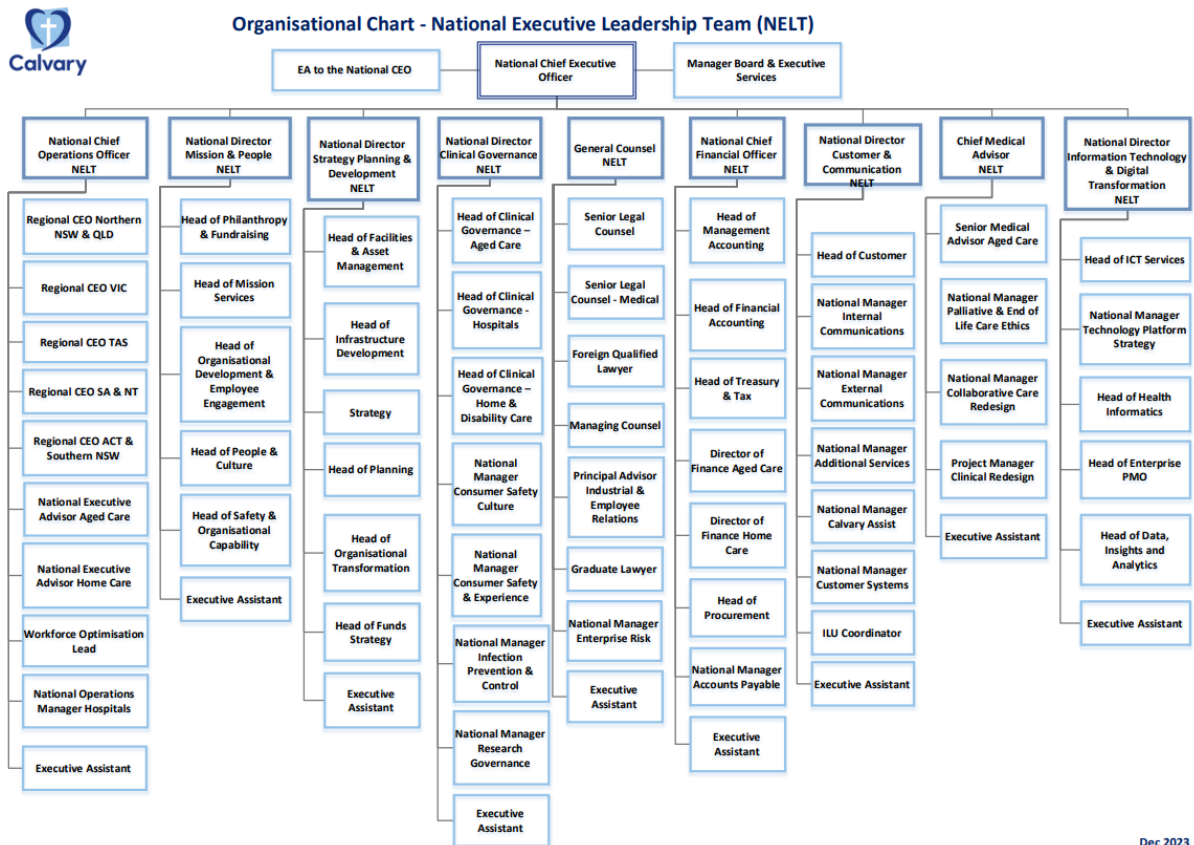
Our Organisational Structure

Little Company of Mary Health Care Limited (LCMHC) and its subsidiaries (trading as Calvary Health Care) are charitable not-for-profit public companies limited by guarantee, registered under the Corporations Act 2001.

Calvary’s Board of Directors is chaired by Mr Jim Birch AM. Calvary Ministries exercises a stewardship role over the health, aged and community care programs and services conducted by LCMHC and its subsidiaries, to improve the health and well-being of the communities they serve. Details of Calvary Ministries and our Board of Directors can be found on our [website](#).

Our National Executive Leadership Committee, under National CEO, Martin Bowles AO PSM, oversees Calvary’s strategic intent, and delivers on Calvary’s mission of “Being for others”.

Calvary operates as a parent company, with hospitals, residential aged care and home care services as controlled entities.



Dec 2023

Our Governance Framework

As a provider of healthcare to the Australian community, Calvary operates under a strong corporate governance framework, underpinned by our mission and values. During the 2023 reporting period, Calvary's modern slavery initiatives were overseen by the National Director of People and Corporate Services, and the National Director of Mission, reporting to the LCMHC Board, through the National Executive Leadership Committee. Under their guidance the team ensures that skills and resources can be accessed throughout the business, such as human resources, procurement, legal, and training and development teams.

In 2018, Calvary established a modern slavery steering committee, with representation strategically selected from a cross-section of business units, which were well positioned to enable rapid changes to policy, process, and mandated activities. The steering committee developed non-negotiable criteria for business partners, which were approved by the Board in 2018.

During the 2023 reporting period, Calvary's modern slavery initiatives were supported by the People, Values, Communications, and Culture Committee (PVCCC), with regular communications being produced for this group. The PVCCC advises on embedding Calvary's mission, vision and values into its strategic focus, leadership, and organisational behaviours, and took a special interest in advancing modern slavery and human rights issues within the Calvary business. In addition to this critical group, Calvary's Finance, Performance, and Risk Committee provided guidance and feedback to strengthen the governance process.

Our Operations

Calvary operates 13 public and private hospitals, 62 residential aged care homes and 17 retirement living villages, and a national network of 17 home care centres around Australia. Calvary's head office is located at Level 15 - 345 George Street, Sydney, New South Wales 2000. With a team of more than 17,407 employees, in 2023 Calvary had 234,198 hospital admissions, conducted 141,480 surgical procedures, provided home care services to 16,943 clients and provided 2.62 million hours of care to our aged care residents. In 2023, revenue from our operations was \$1,844,471

Calvary has three public and ten private hospitals providing acute and sub-acute care. Our hospitals cover a broad geographical footprint across Victoria (Vic), Tasmania (Tas), South Australia (SA), New South Wales (NSW) and Australian Capital Territory (ACT). Calvary Home Care has been supporting people in their own homes and communities for more than 20 years in Vic, Tas, SA, Northern Territory, NSW, and ACT. We deliver a range of aged care, disability and other support services enabling independence, improved social connections and promote positive health and wellbeing. Calvary Residential Aged Care provides quality care and services within a supportive environment where residents are respected for their individuality.

In order to resource the many areas of our business, our direct supply chain consists of a range of large multinationals and small, local businesses, which provide our services with medical and surgical supplies, pharmaceuticals, energy, food and beverages, and information and communication technology (ICT) hardware and software.

A significant focus over the reporting period was the continued implementation of the "new Calvary" homes into the Calvary business. The additional homes were successfully implemented in 2021/22, with continued review and consolidation into the supply chain.

Our Supply Chain

As a multi-faceted healthcare organisation operating throughout Australia our supplier base is diverse, ranging from large multinational organisations with highly diverse supply chains through to sole traders delivering site specific services.

During the 2023 reporting period, Calvary transacted with 6,183 suppliers.

We procured goods and services in the following primary spend categories:

| Indirect | Direct |
|------------------------|---|
| Recruitment and Agency | Drugs and Pharmaceutical Services |
| Professional Services | Clinical Services (e.g. Pathology, Allied Health) |
| Facilities Management | Major Medical Equipment |
| ICT | Medical and Surgical Supplies |
| Logistics | Prosthetics |

Calvary's expenditure on externally sourced goods and services in 2023 was more than \$1.198 billion, which is managed by National Procurement.

In order to effectively manage security of supply, Calvary operates a "multi-region multi-supplier sourcing strategy". This strategy, in conjunction with the broad, and sensitive range of medical consumables required for our day-to-day operations, dictates that we engage with suppliers both locally and internationally. Manufacturing facilities for the goods used in our daily operations are heavily concentrated in China, Europe, and the USA.

Reporting Criteria 3: Modern slavery risks in operations and supply chain

We believe the importance of a modern slavery program extends beyond an organisation's legal accountabilities. Ensuring that modern slavery does not exist in our supply chain or operations aligns with our core values and mission as a care-giving organisation.

In 2023, our efforts focused on fostering a transparent and collaborative relationship between our organisation and our suppliers, educating our staff to understand and recognise the risks, and building systems and processes to allow for the reporting and escalation of any suspected or observed risks.

In the 2022 reporting period, Calvary renewed our membership of ACAN. We believe that combining our efforts with other like-minded organisations in our business sector will deliver the greatest impact in the shortest time.

Our supplier heat map exercise and supply chain investigations that we conducted with ACAN have enabled us to identify key risks and areas of focus, develop an effective response and build plans for the future, which are contained in this report.

OPERATIONAL RISKS

Overview

Calvary provides a diverse range of services to patients, residents and clients, where consumer and clinical choice is often a factor in procurement decision making. As a result, we recognise that the risk of modern slavery is something that occurs in our operations and supply chain. We work to proactively identify and mitigate these risks through a program outlined in this statement.

Throughout 2023, Calvary has looked to increase our modern slavery risk management approach and continuous improvement activities across different key areas of operation.

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

In line with best practice, Calvary with the support of ACAN, is committed to continuously improving our maturity across governance, risk management, risk assessment by identifying strengths and weaknesses in Calvary's approach.

Our People

Calvary takes pride in our commitment to be an equal employment opportunity provider, encourage workplace diversity and continue to promote equity, transparency, efficiency and a non-discriminatory approach to the recruitment, selection and appointment of staff.

Calvary employs most of our team directly, lowering the risk of modern slavery occurring within our workforce. However, we occasionally utilise third party labour hire.

As of December 2023, Calvary has 17,407 employees. Of our staff, 14,042 are female, making up approximately 80 per cent of our workforce.

Calvary's recruitment and hiring policies are governed by our Recruitment, Selection and Appointment Procedure. This policy outlines responsibilities of hiring managers who are supported by a strong national and local Human Resources team.



"Calvary North Adelaide Hospital staff."

Modern Slavery Gap Analysis

In 2023, Calvary has partnered with ACAN and reviewed maturity of our own organisation. Our analysis provided considerable insight into areas of improvement which we will endeavour to improve over the 2024 reporting period.

The evaluation helps to identify strengths and weaknesses in Calvary's approach, across the four pillars.

- **Governance:** sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.
- **Risk assessment:** at-risk-areas in our operations and supply chain, continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
- **Risk management:** mitigating actions, and adaptable to changing circumstances, and driving measurable impact.
- **Effectiveness:** the impact of our anti-slavery efforts and what holds us accountable.

While many such metrics are proxy-measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

Calvary will develop an action plan based on the initial findings for each pillar and look to set SMART (Specific, Measurable, Achievable, Relevant, Time-bound) objectives to guide further improvements for 2024 to Calvary's Modern Slavery program.

SUPPLY CHAIN RISKS

The ACAN Health working group was established to coordinate the effort across all hospitals and aged care providers in ACAN. Throughout 2023, we have started to work together to understand where our supply chains overlap. The plan is to start engaging high risk suppliers, where more than one ACAN entity is procuring product and/or services to leverage our joint scale. Importantly, this work is precompetitive, and no information about individual pricing or volume is shared. All information is held and analysed by ACAN, not individual entities.

Reporting Criteria 4: Actions taken to assess and address risk

Calvary's modern slavery risk management initiatives can be split into three broad categories:

- Risk identification and mitigation in our internal operations and supply chain
- Staff awareness through education and training
- Demonstrating our commitment through internal policies and procedures.

Modern slavery action plan and road map

Increasing Awareness

- Calvary has continued to implement mandatory training for procurement staff and those involved in supplier relationship management. The Modern Slavery 101 module provides an overview of what is defined as modern slavery, who is at risk and where it is most likely to occur in our supply chains and operations. During this reporting period, this module was assigned to 625 staff members. In 2022, 36 per cent of staff completed this course compared to 27 per cent in 2021. This module has also been made available to all staff through our e-learning platform to encourage broader organisational learning about modern slavery.



- In 2020, we reported that a second module would be added during 2021. This module was completed and tested in 2022. This module has now been rolled out.

- **Supplier Engagement**

- Calvary has continued to communicate with all current suppliers on the steps we have and are undertaking to ensure we meet, and where possible exceed, our obligations with regards to modern slavery legislation.
- Calvary has notified all suppliers of our expectations of them, as our partners, in supporting our efforts in addressing this issue including adhering to our Business Partner's Criteria and Ethical Procurement Policies and maintaining open and honest communications with us on this matter.
- Calvary joined Sedex via ACAN during the reporting period. Sedex is a data exchange platform, designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.
- Calvary invited high risk / high volume suppliers for on-boarding to the Sedex platform. Once invited to join the platform as a supplier of Calvary, the suppliers fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).
- Moving forward Calvary plans to use Sedex to:
 - Manage the risk of modern slavery with existing suppliers
 - Validate inherent risk against actual risk
 - Screen new suppliers as part of tenders and supplier on-boarding processes
 - Gain visibility further upstream in the supply chains
 - Monitor and report on progress in the profile of suppliers.

- **Our People**

- Calvary's third party labour hire contracts have been updated to include modern slavery risk management requirements.

- **Our Policies and Contract Terms**

- Calvary maintained our policies on modern slavery and ethical sourcing including:
 - Business Partner's Criteria
 - Ethical Sourcing Policy
 - Code of Business Practice
 - Declarable Minerals List.
- Calvary requires all new contracted suppliers agree to our Business Partner's criteria to be considered as a supplier to Calvary.
- Modern slavery clauses have been included in Calvary's minor works and supply contract templates, which were revised during the 2021 reporting period, and used as our standard terms for minor works during 2022 and throughout 2023.

- **Sector collaboration**

- Calvary is a member of the ACAN and has actively participated in joint activities with other Catholic organisations including the sharing of non-commercial information and analytics as part of a sector wide response to modern slavery.
- Calvary is a member of the Catholic Negotiating Alliance CNA and issued supplier self-assessments to our joint top-30 high risk suppliers.
- Calvary continues to work with other CNA members to address any identified risks.

- **Remediation**

Calvary intends to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Australian Modern Slavery Act 2018 (Cth) – Guidance for Reporting Entities and other relevant Australian laws.

The remedy includes providing for, or cooperating in, actions to address harms to people and to address future risks if Calvary is found to have caused or contributed to modern slavery. Due to the complexity of remediation, Calvary will need to source specialist resources that ensure the best outcomes for people impacted by modern slavery. To this end, Archbishop Fisher established Domus 8.7, to provide remedy to people impacted by modern slavery as reported in 2022.

Domus 8.7 is a not-for-profit unincorporated association established to act as a community and social welfare service for individuals, groups and entities who seek advice in relation to modern slavery, including providing relief to victims of modern slavery. Domus 8.7 will provide remediation services for people impacted by modern slavery and a confidential advisory service.

Domus 8.7 Principles:

- Independent advice and support
- Ensuring people impacted are safe and protected
- Any work undertaken is with the full knowledge and consent of people impacted
- Human rights based approach.

Domus 8.7 Overview:

- A vital service and key element of the ACAN Program in Australia.
- Addresses a key mandatory reporting requirement of the Master Service Agreements.
- Provides the support needed for a rapid, coordinated response when victims are identified
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Through Domus 8.7, Calvary will be able to help people impacted by modern slavery achieve outcomes that can be reported on and used to continuously improve risk management and operational response. It is the intention of Calvary to have any future grievances in relation to modern slavery mediated through Domus 8.7. Where Calvary is directly linked to modern slavery by a business relationship Calvary is committed to working with the entity that caused the harm to ensure remediation and prevention of its recurrence.

Calvary staff and stakeholders are being equipped to recognise the causes of modern slavery, and the mechanisms available to escalate poor labour practices, unsafe working conditions and other indicators of modern slavery.

Calvary has also developed a more detailed anti-slavery contract clause focusing on remediation obligations and expectations, for inclusion in contracts with high-risk suppliers. This clause imposes obligations on these suppliers to notify and consult Calvary to ensure victim-centred remediation processes are implemented to the satisfaction of Calvary.

When suspicions of modern slavery practices are notified through the whistle-blower service or other channels, Calvary staff will continue to contact relevant law enforcement agencies if a person is in immediate danger and Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Reporting Criteria 5: Effectiveness Assessment

We are continuously monitoring our progress against our commitments in 2023, as well as identifying new opportunities to improve our modern slavery program.

In 2023 we met all targets as detailed in this report, including:

- Calvary has extended direct invitations to 121 suppliers to join Sedex, of which 53 have been accepted.
- Through our collaboration in the ACAN health working group, overlap in the supplier base has been identified resulting additional suppliers which are already on Sedex being linked to us.
- Of our suppliers on Sedex, 89 have not finalised the Sedex Self-Assessment Questionnaire (SAQ). This year, 32 suppliers completed the SAQ, an increase of 14 from the previous year.
- With the 32 SAQ completions, the outcome has resulted in 24 suppliers classified as low risk and eight medium risk.
- It is important to note that this risk classification hasn't identified any high-risk suppliers. This could be a result of the real high-risk suppliers being reluctant to part take in the process possibly because they have their own programs.
- Calvary will keep an eye on this in the future, using the ACAN risk taxonomy for those who do not engage and complete further steps as requested.
- Applying the ACAN risk taxonomy, Calvary has 5,854 suppliers classified as having an inherent risk level of 'high'. We will continue to test this assumption moving forward.

In 2024 and future years, we will be establishing milestones centred around:

- percentage of staff who have completed mandatory training
- number of audits conducted against suppliers
- number of supplier remediation programs completed.

While we recognise the need to develop and evolve our targets and measurements, in 2023 we have taken steps to enhance our metrics (as seen in the Supply Chain Risk section of this statement).

Being the third year of measuring, we recognise that we can improve further on how we measure this.

We can provide the following data as a baseline for further reporting:

| Focus | Description | 2023 |
|----------|--|-----------|
| Internal | Hours spent on Modern Slavery Activities | 242 hours |
| | eLearnings completed | 56 |
| External | Total number of suppliers | 6,183 |
| | Total number of high-risk suppliers | 5,854 |
| | Invited to join Sedex | 121 |
| | Joined Sedex | 67 |
| | Suppliers completing Sedex risk assessment SAQ | 32 |
| | Suppliers attending training | 4 |
| | Social audits (Supplier site audit) | 7 |

In the future, we aim to evolve these metrics further, e.g.; by adding new and more accurate metrics or by retiring metrics which weren't useful.

In 2024, future metrics could involve audit results/corrective actions, supplier and staff engagement etc., but ultimately any new metric should refine the underlying understanding of the risk we have and the impact to people.

Reporting Criteria 6: Process of consultation with entities owned or controlled

The LCMHC Board is the single Board which governs all entities, owned and controlled. Similarly the National Executive Leadership Committee manages all entities, owned and controlled with the support of Regional CEOs, to whom all owned and controlled service level executives report.

As the reporting entity, Calvary has developed policies, procedures and mandatory training and education materials for use by all Calvary entities. These were developed in consultation with all entities to ensure the highest level of adoption and compliance.

Reporting Criteria 7: Other

Since 2019, Calvary has been a member of the ACAN. Along with the network, we have contributed to a wider risk management process across multiple industries.

We are continuing with our membership of ACAN next year, as addressing the risk of modern slavery involves long-term commitment.