

# Modern Slavery Statement 2024

## Declaration

This statement is made in accordance to the Modern Slavery Act 2018 (Cth) on behalf of Aidacare Pty Ltd (ABN 40 134 398 833) and its wholly owned and controlled entities, referenced collectively in this statement as “*Aidacare*”.

Aidacare Pty Ltd

And its subsidiaries

- 4 Healthcare Pty Ltd
- A C & P L Way Pty Ltd
- Access Mobility Pty Ltd
- Essential Care (Australia) Pty Ltd
- Hunter Mobility & Independence Pty Ltd
- NLPL Pty Ltd
- Nth Degree Care Pty Ltd
- Total Mobility Solutions ACT Pty Ltd
- Total Mobility Solutions Pty Ltd
- Emprise Pty Ltd
- Monster Water Sports Ltd
- Australian Trade Partners Pty Ltd

Details of our proactive measures to identify modern slavery risks within our business and supply chain during for the financial year ending in June 2024, are outlined in this statement. We are committed to ensuring the implementation of relevant and effective responses, and translating these intentions into practical measures that reinforce our dedication to ethical practices and responsible business conduct.

This statement was approved by Aidacare's Board of Directors.

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## Structure Overview and Supply Chain

### Structure & Operations

Aidacare is one of Australia's leading healthcare equipment and service providers. Headquartered in Moorebank, Sydney, Aidacare employs 1300 people across 90+ national branches with key operational locations in every state.

Aidacare serves a diverse clientele in the Acute Care, Residential Aged Care, Home and Community Care, and Complex Rehabilitation sectors. Aidacare sources and distributes healthcare equipment to wholesale, retail and direct business customers, and also provides a range of hire, repair and preventative maintenance, and customisation services.

Relevantly in this context, Aidacare operates a Product team and a Supply Chain Logistics team, with the heads of both teams reporting directly to the Chief Executive Officer.

## Supply Chain

Our supply chains extend globally, and incorporate the sourcing of a broad range of products including mobility scooters, power wheelchairs, lift recline chairs, rollators and walkers, medical beds, toileting & bath aids, mattresses, commodes, patient standers, hoists and slings.

The structure of our supply chain can be broadly categorised as follows:

- i. Overseas contract-manufacturing and importing
- ii. Local sourcing from unrelated-party importers or manufacturers;
- iii. Wholesale & Retail in Australia through direct operations.

Approximately 65% of our inventory is procured internationally, with primary tier 1 suppliers located in China, the United Kingdom, Taiwan & Italy.

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## Risk of Modern Slavery Practices

Aidacare sources products from both national and international manufacturers. Our local suppliers are bound by and comply with Australia's Modern Slavery Act 2018 and its risk-based framework. Australia possesses extra-territorial jurisdiction for laws relating to slavery offences, meaning legal action can be pursued regardless of citizenship status of the offender or the victim, and whether the offense transpired within or outside of Australia.

Regarding commodities or products flagged as high risk in the Global Slavery Index (GSI), Aidacare has conducted a thorough assessment and identified the following products and their countries of origin as high risk in our supply chain:

- Timber: Sourced from China.
- Electronics: Sourced from Taiwan.

It's important to note that Timber & Electronics represent only approximately 20% of our procurement value. The majority of our supplied commodities (i.e. steel and plastic goods) are not identified on the GSI.

Aidacare's process with external suppliers involves on-site inspections and reviews of documented policies and procedures. The results allow Aidacare to establish if there is satisfactory compliance with company policies and local regulations.

Additionally, supply chain assessment throughout the year have determined the following risk levels:

- **Overseas Contract Manufacturing:**
  - Risk of direct contravention by manufacturing partner.
  - Risk of indirect contravention by component supplier to our manufacturing partner.
  - Risk assessment: *Moderate*
- **Local Sourcing from unrelated parties:**
  - The same risks as above but via indirect means.
  - Risk assessment: *Moderate-to-low*.
- **Wholesale & Retail operations in Australia:**

- These operations are directly controlled by Aidacare.
- Risk assessment: *Low*.

The Product team are responsible for investigating and reporting potential modern slavery practices associated with Aidacare and its suppliers.

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## Risk Management & Due Diligence

We safeguard our organisation against the risks associated with modern slavery by upholding consistently high standards of due diligence. Our inclusive risk mitigation processes are consistently applied to monitor and prevent modern slavery in all operational environments, irrespective of the vulnerability levels of our collaborating suppliers.

### Internal

#### Obligations

The Modern Slavery Statement is reviewed and amended annually with consideration to stakeholders and products in supply chains. Changes detected within supplied products, the source of goods, and risk assessment results are reported and discussed.

In the process of assessing and addressing risks, company policies and training materials are evaluated to determine their effectiveness and relevancy.

The Global Slavery Index is also continuously referenced to maintain standards and direct attention.

#### Training & Awareness

We recognise the importance of our staff, particularly the product, purchasing and supply chain teams, remaining capable and vigilant in identifying indicators of modern slavery and other human rights violations.

Aidacare utilises an external learning portal (LITMOS) to supply a Combatting Modern Slavery course to staff.

75% of staff were compliant at the end of the reporting period, with full compliance achieved at the time of statement submission.

### External

#### Risk Assessments & Due Diligence

##### i. Supplier Evaluation

Existing and prospective suppliers are assessed by the Product Development Team or the Supply Chain Team. Large scale supply arrangements will be approved by an executive director and/or the CEO.

The supplier criteria include:

- ISO Compliant Systems for Quality & Safety – proven history of consistency in service in accordance with industry body standards (e.g, ISO13485, ISO9001).

- Evidence of compliance with Modern Slavery legislation.
- Ability to provide reliable delivery services & financial stability
- Service Performance – Suppliers response time to communication, ability to meet Aidacare’s needs through service support and resolution.

## ii. Vendor Quality Statement & Site-Review

Aidacare's product management staff meet with authorised vendor representatives to conduct a site review to complete/address a Quality Statement.

The site assessment and quality statement are Aidacare's primary means of gathering information about the human rights procedures of existing and prospective suppliers. In conducting an assessment, Aidacare determines the suppliers' documented policies relating to modern slavery in their respective supply chain, their methods for identification and mitigating actions, and details of downstream suppliers.

For Vendors where annual purchases are greater than AUD \$1m, signing a Vendor Quality Statement is mandatory and is explicitly incorporated into the supply process as due diligence. This ensures that our manufacturing partners and their component suppliers, are informed of the Modern Slavery Act and its criteria.

The assessments encompass:

- Review of supplier quality management and safety systems.
- A factory inspection
- Manufacturer compliance checklist requiring vendor agreement and signatures.
- Modern Slavery defined by the Australian Commonwealth Criminal Code.

Post vendor site-inspections by Aidacare staff, they are required to record their risk-assessment findings in a log which is subject to internal audit review.

Through this process, Aidacare can identify, mitigate, and establish preventative measures for modern slavery.

## iii. Remediation & Sign-off

Supplier Statements are used to establish a risk score and improve visibility of supply chains. Relevant review points and/or potential risks or non-conformances are raised and discussed with vendor representatives. If further action is required, an activity plan is agreed upon with a review date set as part of the remediation process.

# Assessment & Effectiveness

## Quality

Aidacare's quality management system is certified, and compliant with ISO 9001:2015 Standards. Policies and procedures are reviewed to ensure we remain aligned with our strategic goals by

assessing opportunities for continuous improvement and identifying exposures in operations and supply chains. Modern Slavery is included in Aidacare's overarching Risk Assessments.

All procedural controls and policies, including our Modern Slavery Statement, Vendor Quality Statement, Risk Assessments and Travel Logs undergo annual review, through planned audits and management review meetings, to ensure our internal and external stakeholders are not exposed to human rights violations, including modern slavery. The next predicted audit is in August, 2025.

## Stakeholder Assessments & Review

Our objective is to adhere to our requirement for signed Vendor Quality Statements from relevant suppliers. A report is prepared and addressed with the directors on an annual basis to discuss and mitigate any potential weaknesses or risks in the supply chains.

All 16 of our Tier 1 suppliers have affirmed their adherence to our Vendor Quality Statement for the current reporting period.

The Product Team will regularly review and monitor supplier arrangements to ensure their reliability and performance to meet the supplier criteria, and report findings to management.

## Summary of Key Actions FY2024

In 2024, we advanced in our approach to combat and prevent human rights violations through the introduction of measurable and reportable **key performance indicators**, which include:

- Number of relevant staff with completed modern slavery training
- Number of identified risks and the subsequent remediation process
- Number of completed Vendor Quality Statements among Tier 1 Suppliers

As our programme evolves, numerical reporting against KPIs will be refined and strengthened with consideration to Aidacare's growth, the needs of internal and external stakeholders, and our obligations under modern slavery legislation.

Our **Internal Audit programme** has expanded to include a dedicated Product & Supplier category. Findings from audits are currently utilised to further enhance operational processes through the review of supplier registers, vendor statements and site-assessment results. This has enabled us to identify segments of our governance framework and procedural approach to improve.

## Key Initiatives for FY2025

Aidacare intends to continue assessing the risks through supplier evaluation and quality management. As the company expands, the effectiveness of practises and programs addressing modern slavery will be reviewed by:

### **Strengthening Governance**

- Re-construct and communicate an improved supplier code of conduct

### **Broaden Employee Awareness**

- Continue developing ongoing communication and training for employees
- Review and assess current modern slavery e-modules
- Expand the rollout of training modules to include wider Operational Team

- Ensure 100% completion of training modules by all relevant employees

#### **Vendor Quality Statements (VQS) & Supplier Due Diligence Questionnaire (DDQ)**

- Extending our VQS to expand its application. This includes the introduction of a supplier code of conduct.
- Develop a DDQ to assist in reviews of selected Tier 2 suppliers

## Consultation

This statement was prepared by Aidacare's Governance Team, with consultation and subsequent approval by executive management and the Board.

Subsidiaries listed in this statement all share the same directors, who are also executive directors of Aidacare Pty Ltd, and therefore directors of all entities have been consulted for this modern slavery statement.

**For & on Behalf of Aidacare Pty Ltd**

Signature



Sam Garland, Director

13 December 2024