Modern Slavery Statement

About Us

Benetas is a charitable organisation structured as a public company limited by guarantee and does not own or control any other entity.

Benetas is a leading not-for-profit organisation engaging approximately 2,000 employees, with a mission to provide older Victorians, their families and carers with a full range of quality community-based services, residential aged care homes, retirement living, primary and home care plus respite services, across metropolitan and regional Victoria. Benetas' main operations include its aged care and community health care services, including the people it directly employs.

Benetas' supply chain includes suppliers and contractors covering hospitality services (i.e. food services, catering, cleaning, laundry); allied health; agency labour; pharmacy & medical supplies; property services (i.e. maintenance, utilities, waste management, security, etc.); information, communication & technology; gardening; equipment purchases; capital & property development works, and investment advisers.

Modern Slavery Position

Benetas rejects any form of modern slavery and human trafficking, and we are committed to implementing effective systems and controls to ensure it does not take place directly within our own business or our supply chains. We respect the human rights of our employees, volunteers, customers, suppliers and business partners, and we aim to identify and manage any risks related to these rights.

Our Workplace Risk Assessment

Benetas engages employees that align with our values and we comply with all relevant local and national laws related to human rights and modern slavery in our workplace. As an organisation a strong focus is placed on managing the health, safety and wellbeing of our employees and volunteers. We are committed to maintaining a diverse and inclusive workplace, treating people with respect, dignity and have no tolerance for discrimination or harassment.

As an aged care service provider in a highly regulated industry, Benetas considers the risk of modern slavery within its direct business operations to be relatively low. However, Benetas recognises that through its supply chain, Benetas may be indirectly exposed to the risk of modern slavery and human trafficking.

Our Investment Funds Management Policy

Benetas' investment strategy covers environmental, social and ethical considerations when selecting suitable investment opportunities and explicitly states that companies who knowingly engage in or are suspected of engaging in modern slavery through supply chain activities will not be considered.

Our Actions Taken

Benetas undertook new updated awareness training courses in 2025 for employees to mitigate any potential human rights violations in our business operations and supply chains through:

- **Governance:** Benetas raises the awareness of modern slavery risks via various internal communications, informing the board and management of our obligations and accountabilities for identifying and managing these risks. Compliance reporting now forms a heavier focus of our improvement of policies and procedures.
- **Policy:** Benetas is further strengthening existing frameworks to address Modern slavery. Requirements continue to be reviewed and updated to ensure alignment with legislative expectations and industry best practice. Supporting procurement documentation now contains strengthened guidance regarding supplier due diligence, ethical sourcing and supplier accountability.
- **Reviews:** Benetas reviews relevant policies, procedures and governance documentation on a regular basis to ensure ongoing effectiveness.

  Compliance reporting, management reviews and continuous improvement activities assist in identifying opportunities to strengthen modern slavery controls across procurement, supplier management and contract management activities.

  Areas of ongoing focus include supplier onboarding documentation, sourcing templates, contract management documentation and governance reporting mechanisms.
- **Awareness Training:** Benetas continues to provide awareness training and educational resources designed to improve understanding of

modern slavery risks and organisational responsibilities.

Training is targeted towards employees involved in procurement, supplier engagement, contract management and approval processes. Completion rates are monitored through compliance reporting and are used to identify areas where additional education or support may be required.

Internal communications and awareness activities also support the promotion of ethical procurement practices and responsible supplier engagement.

Benetas. Completion rates are monitored as part of our key performance indicators. In addition, compliance reports are utilised to determine priority areas within the business which may require refresher training.

- **Supplier Obligations:** Benetas maintains a Supplier Code of Conduct which outlines our expectations regarding ethical business conduct, human rights and modern slavery risk management.

  The Supplier Code of Conduct communicates Benetas' commitment to ethical, socially responsible and sustainable business practices and is provided to new suppliers as part of the supplier onboarding process.

  Suppliers are expected to operate in a manner consistent with applicable laws and demonstrate a commitment to managing modern slavery risks within their operations and supply chains.

- **Supplier Selection:** Tender and quotation documentation requires suppliers to provide information regarding their approach to identifying, assessing and managing modern slavery risks.

  Modern slavery considerations form part of the supplier evaluation process and assist Benetas in understanding supplier governance arrangements, workforce management practices and supply chain controls.

  Where suppliers are identified as operating within categories that may present elevated modern slavery risk, Benetas may undertake additional due diligence activities to obtain a greater understanding of the supplier's risk management framework, labour practices and mitigation strategies.

  Updated procurement templates and sourcing documentation continue to reinforce Benetas' commitment to ethical sourcing and responsible supplier engagement.

  Identified areas of risk include:

  • Labour-intensive services such as **cleaning**, **catering**, **laundry** and **agency** workforce providers;
  • **Medical consumables**, equipment and products sourced through complex international supply chains;
  • **Construction**, **maintenance** and **capital works** involving **subcontracted labour** arrangements; and
  • **Textile** and **uniform** supply chains where manufacturing may occur in higher-risk jurisdictions.

- **Supplier Compliance:** Benetas utilises an online contractor compliance and induction system which adopts a risk-based approach to supplier management.

  This framework supports the identification of higher-risk supplier categories and enables targeted monitoring activities where appropriate.

  Benetas continues to strengthen supplier oversight through risk-based governance activities and supplier engagement processes designed to improve visibility of modern slavery risks across the supply chain.

- **Grievance and Feedback Mechanisms:** Benetas has a Whistleblower Policy and complaints mechanism process that allows all Benetas directors, executives, managers, employees, volunteers, suppliers, contractors and consultants, with the ability to raise concerns such as modern slavery risks in a confidential manner.

What we are planning

Benetas will strengthen our understanding of human rights issues as they apply to our business operations and in particular our supply chains.

Our key areas of focus:

- Benetas will continue to strengthen its understanding of human rights issues as they apply to our business operations and supply chains.
- Continuing to update relevant policies, procedures and governance documentation to strengthen modern slavery controls.
- Reviewing the effectiveness of procurement and contract management frameworks in supporting the identification and management of modern slavery risks.

- Continuing to apply a risk-based approach to supplier due diligence and supplier monitoring activities.
- Further engaging with suppliers operating within higher-risk categories including labour-intensive services, medical consumables, catering services and linen suppliers to better understand their modern slavery risk management practices.
- Maintaining and refining procurement risk registers and supplier risk assessment methodologies to support targeted monitoring and due diligence activities.
- Investigating opportunities to enhance reporting, monitoring and performance measurement relating to modern slavery risk management.
- Continuing to build employee awareness and understanding of modern slavery obligations and responsibilities.

Assessing Effectiveness: Benetas assesses the effectiveness of its modern slavery program through a range of governance, compliance and monitoring activities including:

- Monitoring employee participation in modern slavery awareness and compliance training programs;
- Reviewing supplier due diligence outcomes and supplier risk assessment activities;
- Monitoring compliance with procurement, contract management and supplier governance requirements;
- Reviewing supplier onboarding documentation and contractual commitments relating to ethical business conduct and human rights;
- Monitoring the utilisation of grievance, complaints and whistleblower reporting mechanisms;
- Assessing findings arising from internal reviews, audits and compliance activities; and
- Evaluating opportunities for improvement identified through management reporting and governance forums.
- The organisation remains committed to strengthening its understanding of modern slavery risks and improving the effectiveness of controls implemented to address those risks.

Statement

This statement was approved by the Board of the Anglican Aged Care Services Group trading as Benetas (ABN 60 082 451 992) pursuant to section 13 of the Modern Slavery Act 2018 and constitutes our modern slavery and human trafficking statement for the financial year ended 30 June 2026.

This statement is signed by Julia Pryor in her role as Chair of Anglican Aged Care Services Group.



Julia Pryor *Chair* October 2026