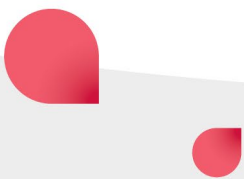




Modern Slavery Statement 2024



Introduction

Bolton Clarke is Australia's largest independent not- for-profit provider of home care, retirement living and residential aged care.

Our vocation to care is demonstrated in our support, services and welcoming home environments that enable people to live positively. We have been caring for Australians since 1885.

This Statement is submitted as a joint statement in accordance with the Modern Slavery Act 2018 (Cth). It is submitted by RSL Care RDNS Limited as trustee of the RSL (QLD) War Veterans Homes Trust trading as Bolton Clarke ("RSL Care") on behalf of the reporting entities in the Bolton Clarke Group being RSL Care and its wholly owned entities Royal District Nursing Service Limited and McKenzie Aged Care Group Pty Ltd. This Statement is also submitted on behalf of RDNS Homecare Limited, which is reported on a voluntary basis. The reporting entities are governed by common Board and operate under the same leadership and governance policies and frameworks. The roles and responsibilities of each Board are outlined in the Bolton Clarke Board Charter and Manual.

Because the reporting entities are managed by the same executive leadership team and are supported by the same operational, procurement, governance, finance and legal functions it is considered that all reporting entities have been consulted to provide this statement.

Acknowledgement of country

Bolton Clarke acknowledges all Aboriginal and Torres Strait Islander Traditional Owners of Country throughout Australia and recognises their connection to land, sea, culture and community.

We pay our respect to Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander Peoples.

A message from the Group CEO

I am pleased to present Bolton Clarke's 2024 Modern Slavery Statement. This statement outlines the work we have undertaken during FY2024 to understand, identify and address modern slavery risks.

The Global Slavery Index 2023 highlights that 50 million people across the world are living in modern slavery. As Australia's largest independent not-for-profit aged care provider, Bolton Clarke is committed to raising awareness of this global issue and combatting modern slavery with improved transparency in our supply chain and the services we deliver.

Bolton Clarke's purpose is 'Helping people live a life of fulfilment'. This purpose is brought to life through clearly defined values – Be kind, Be Curious and Listen - that are central to the delivery of our connected care and living options to customers. This extends to our organisation wide approach and response to modern slavery engaging with suppliers and employees – from new ways of working and sharing information to tailored workforce and industry education and training.

Our 2024 Modern Slavery Statement highlights important progress we have made and our future focus as we continue applying our values to make a difference within our own communities and beyond.



Stephen Muggleton

Group Chief Executive Officer

About Bolton Clarke

Bolton Clarke has a rich tradition of care starting with Australia's first home nursing service in Melbourne in 1885. From delivering services by bicycle during the Spanish Flu pandemic in 1919, to caring for our clients and residents today, our nurses and carers have been helping people live well for 139 years.

Our organisation today

Our 16,000 employees make 10,905+ daily home and community support visits and care for residents in 88 residential care homes and 39 retirement living communities.

The story behind our name

Brigadier General William Bolton

Brigadier General William Kinsey Bolton was an Australian soldier during World War I, serving during the initial battles of the Gallipoli campaign. After his return to Australia he helped found the Returned Sailors and Soldiers Imperial League of Australia, the forerunner of the RSL, and served as its first national president.

Lady Janet Clarke

Well known philanthropist Lady Janet Clarke was President of the Melbourne District Nursing Society from 1889-1908 and later became a Life Governor.



Our service locations

The Bolton Clarke Group is headquartered in Brisbane, Queensland and operates domestically across Queensland, New South Wales, Victoria, South Australia and Western Australia.



Our services

The Bolton Clarke Group provides a full continuum of care to support changing needs throughout life, offering the following services:



Home Care

- Commonwealth Home Support Program
- Home Care Packages
- Home and Community Care Program (under 65) (VIC)
- Hospital liaison services
- Day therapy centres (QLD)



Residential Aged Care

- 88 residential aged care communities across QLD, NSW, VIC, SA and WA
- Respite care
- Dementia care
- Palliative care



Retirement Living

- 39 villages across QLD, NSW, VIC, SA and WA
- Design, develop, commission and operate villages
- Co-located with Residential Aged Care



Education, training & research

- Community health and wellbeing education
- Nationally accredited courses for workforce development
- Bolton Clarke Research Institute



Chronic disease management

- Hospital Admission Risk Program
- Transition Care
- Restorative and rehabilitation care
- HIV / AIDS program
- Homeless Persons Program



Telehealth & customer service

- Virtual nursing
- In home monitoring
- Social connection support
- National pregnancy, birth & baby health line
- Dedicated call centre: 7 days a week, 365 days a year
- Language interpreter lines

How we work

An independent skills-based Board governs Bolton Clarke’s services and care in line with our 2028 Strategic Directions. A values-driven executive leadership team supports the Board and drives the delivery of high-quality, safe and reliable care and services for our clients and residents.

Bolton Clarke has clearly defined governance practices set out by the Board that adhere to the governance standards and laws of the jurisdictions in which we operate.

Our purpose and values

The voice of the customer is at the heart of all we do – we listen to our customers and respond guided by our consumer engagement and feedback framework.

Our purpose and values

The work we do is driven by our purpose to help people live a life of fulfilment.

Our values of Be Kind, Be Curious and Listen are bringing life to our purpose. They reflect our commitment to our customers and everyday interactions with each other.

How we operate

The way we operate ensures we actively engage with our customers to develop responsive and supportive services that recognise people’s unique needs, interests and experiences.

Our customers can expect us to:

- Treat them with dignity and respect
- Understand and respond to their individual needs
- Act with empathy and integrity
- Continually improve what we do via insights, research and innovation



Sustainability at Bolton Clarke






In 2024, we strengthened our focus on creating a lasting, positive impact for our customers, people, community and environment with the development of our sustainability strategy and establishment of a dedicated team.

We have a long history of commitment to the communities in which we operate and have initiated many social and environmental initiatives that make a difference.

Our sustainability strategy brings together and connects all of these initiatives so we can better measure their impact and understand emerging risks and opportunities. It reflects our 2028 Strategic Directions, setting out our priorities and focus areas for FY25 and beyond. As with everything we do, our customers are at the heart of our approach to sustainability – our strategy is built on their experiences and the things that matter most to them, their families and communities. We will continue to seek feedback from our customers about what sustainability means to them and build partnerships and collaborations to ensure we can meet their needs now and in the future.

Our sustainability pillars

Our approach to sustainability is underpinned by five pillars:

	Customer at heart We actively listen to our customers and communities to ensure we can meet their needs now and in the future.
	Connected communities We partner and work with communities to make a positive difference on the things that matter most to our customers.
	Inclusion, wellbeing and belonging We celebrate diversity in our teams, people and the communities we serve, recognising its importance in creating a sense of belonging and inclusion.
	Environmental resilience Evaluating our environmental footprint and climate risk are integral to our decision making and strategic planning.
	Governance Strong governance is at the core of how we build resilience, manage risks and ensure the long-term sustainability of our organisation.

Our supply chains

To provide our services, Bolton Clarke purchases goods and services from suppliers in remote, regional and metropolitan areas in Australia, as well as from international manufacturers located in both developed and developing countries. We have established long-term relationships with key strategic suppliers and distributors, the overwhelming majority of whom are located in Australia.

75% of our expenditure is with 100 suppliers.

91% of our expenditure is across the following 7 major spend categories:

Food, catering and hospitality	21%
Labour hire/ agency staffing	17%
ICT software, networking and support services	16%
Aged care and homecare support services*	11%
Medical equipment, consumables and supplies	11%
Property and facility maintenance services	11%
Allied health services	4%

**Means consumer directed care expenses that are services not considered allied health or labour hire including home modifications, domestic assistance and social support, visiting entertainers, transportation etc.*

Key impacts on our operations and supply chains

COVID-19

In FY2023/24 the Covid-19 pandemic has had minimal impact on our operations and supply chain when compared with previous years. Bolton Clarke has resumed supply from its preferred suppliers and has a lower requirement for pandemic supplies in comparison to previous years.

Other

The main impacts on the supply chain and operations in FY2023/24 were:

- Workforce availability; and
- the acquisition of the McKenzie aged care business and the integration of its supply chain

Workforce availability:

The labour market in Australia is heavily regulated, with specific emphasis on regulation in aged care sectors. The difficulty in hiring workers continued throughout FY2023/24 – resulting in an ongoing requirement for agency workforce support.

Bolton Clarke recognises that use of third-party workforce (agency staff) brings with it higher potential modern slavery risks. We have taken steps to minimise the risk of modern slavery in the agency worker supply chain by, wherever commercially possible, requiring all agencies we contract with to agree to Bolton Clarke's standard agency engagement terms and conditions. These include robust provisions requiring suppliers to commit to compliance with the Bolton Clarke Supplier Code of Conduct and the

Modern Slavery Act 2018 (Cth) and to develop and implement policies and procedures aimed at reducing modern slavery risk in their operations.

As noted in the FY2022/23 report, Bolton Clarke is a Pacific Australia Labour Mobility (PALM) scheme approved employer, allowing us to engage with workers from the Pacific Islands to supplement workforce gaps in some of our more remote locations. The Case Study on page 10 provides more information relating to our PALM support program.

Acquisition activity:

The acquisition of established aged care businesses commenced in FY 2021/22 and continued over FY2023/24 with the acquisition of the McKenzie aged care group. This acquisition not only increased our workforce, but also increased the number of suppliers to be managed by Procurement. While, due to the nature of the sector, many of the suppliers were shared across the Group, some new suppliers were introduced to the Procurement team. This included contract cleaning suppliers, which is labour intensive and can be considered high risk in relation to modern slavery. To address this risk the Bolton Clarke Procurement Team requested further information from the suppliers to the McKenzie aged care group. This included requiring details of the management of modern slavery risk in their operation and supply chains such as wage and shift details for contracted labour in the catering services area to confirm that payment was in line with the correct Award rates. Subsequently, the Bolton Clarke Procurement Team have been working on transitioning or aligning these suppliers to contracts using the robust Bolton Clarke Moderns Slavery contractual clauses.

Identifying modern slavery risks in our operations and supply chains

In FY2020/21, Bolton Clarke engaged the services of a third-party subject matter expert to conduct a deeper dive into the highest risk suppliers.

Our work during FY2020/21 identified the High Risk spend categories, which haven't changed in FY2023/24.

These categories include:

HIGH RISK – Spend category
Medical equipment, consumables and supplies
Labour hire
Property and facility maintenance
Food, catering and hospitality
Aged care and home care services*

**Means consumer directed care expenses that are services not allied health or labour hire including home modifications, domestic assistance and social support, visiting entertainers, transportation etc.*

During FY2023/24, the Procurement Team reviewed action plans developed by suppliers who completed questionnaires in the previous reporting period. This included food suppliers and medical consumables suppliers.

Review of the questionnaire responses indicated that there were no significant remediation actions to be taken in respect of those suppliers, with the distributors working with manufacturers directly on their modern slavery risks using a continuous improvement approach.

During the FY 2023/24 reporting year, formal sourcing events were undertaken across five categories. Questions relating to modern slavery management were included in all of the sourcing documents. The responses to the questions disclosed a varied approach to modern slavery, with all suppliers aware of it and with policies in place, however some suppliers were quite sophisticated with formal programs similar to Bolton Clarke's, whereas other suppliers were less mature. During the sourcing process, a score weighting was allocated to the modern slavery responses (variable by category and potential risk of modern slavery) to ensure recognition of the practices that suppliers were undertaking.

Case Study – PALM workforce

Responding to the critical aged care workforce shortage, the federal government's demand-driven Pacific Australia Labour Mobility (PALM) scheme enables approved Australian employers to recruit from nine Pacific Islands and Timor Leste. Under the scheme employers can access aged care workers for roles of up to four years.

Through its international sourcing strategy, Bolton Clarke has a longstanding and successful partnership with the scheme, having welcomed its first PALM workers to Longreach from Kiribati in 2018. In 2024, Bolton Clarke worked with PALM and the Aged Care Expansion Program to train and recruit 98 workers from Fiji for 17 homes across Queensland and NSW.

A key component of the scheme is ensuring participants have access to the same rights and protections as Australian workers. To identify and address potential risks and challenges, Bolton Clarke's international sourcing team consulted with the Fijian Government. This led to an innovative partnership, with newly recruited workers completing 16 weeks of training in Fiji with Australian training organisation, Alphacrucis University College, one of the first international providers recognised and registered to deliver Australian standard qualifications in Fiji.

After successfully completing the training, new team members were introduced to Bolton Clarke through a planned induction and onboarding program in Australia which included additional clinical learning and sharing of cultural experiences. Participants then completed a further six-week practicum on site in their placement homes to achieve a Certificate III in Individual Support (Ageing).

Enabling new team members from Fiji to form strong community connections while in Australia has been a focus to support continued employee wellbeing. Bolton Clarke has facilitated connection with local church and community groups and recreational centres and has a dedicated team in place to be the first point of contact supporting health and wellbeing. Additionally, the organisation has trained 100 Bolton Clarke employees as 'buddies' across 17 participating locations.

The PALM scheme has enhanced opportunities for cross-cultural sharing and achieved a positive response from residents, families and fellow employees. The success of Bolton Clarke's collaborative approach is evidenced in a strong retention rate with 98% of those recruited committing to stay up to the full four-year term.

Monitoring the supply chain for modern slavery risk

During the reporting period, the Bolton Clarke Procurement Team monitored domestic and international news and journals for instances of modern slavery that may impact our supply chain via our direct suppliers or via the sub-contractors to our suppliers.

The monitoring has proved effective given it has triggered further investigation. An example of the monitoring leading to further investigation occurred when details of a Fair Work Commission complaint regarding the underpayment of workers' wages by a fresh produce supplier was reported. Bolton Clarke promptly took steps to confirm that the supplier and producer were not engaged in its primary or secondary supply chain.

Actions taken to assess and address modern slavery risks

Our policy framework

Bolton Clarke has a comprehensive set of policies that articulate our values, ways of working and expectations of our team and suppliers. This policy framework ensures that our team members and suppliers clearly understand our expectations.

The following policies are those that are most relevant to preventing modern slavery in our supply chains:

Policy	Purpose
Modern Slavery Standard	Outlines our stance and expectations of suppliers, contractors and business partners in relation to our modern slavery obligations at the outset of the business relationship and is reinforced thereafter
Supplier Code of Conduct	Explicitly sets out our expectations of suppliers to allow Bolton Clarke to meet its own stringent requirements for ethical conduct and supplements the contractual arrangement between both parties
Whistleblower Policy	Outlines the available avenues for workers, suppliers, contractors and their family to report or disclose any concerns they may have relating to reportable misconduct
Code of Conduct	Provides workers with a clear understanding of the standard of conduct expected when performing work as a Bolton Clarke employee
Equity, Diversity, Bullying, Harassment and Anti-Discrimination Standard	Articulates our commitment to equal opportunity and aims to ensure our workplace is free from unlawful discrimination, harassment and vilification and fosters safety, fairness, equity and respect for diversity
Fraud Control Plan, including Fraud Control Policy and Fraud Control Standard	Sets out examples of fraud and corruption to allow our team to recognise and take proactive steps to prevent these risks and establishes the appropriate pathways for reporting and investigation.
Enterprise Agreements	Our Enterprise Agreements set out the terms of employment and remuneration which apply to a majority of our health and aged care workforce

Health, Safety and Wellbeing Policy	Supports behaviours and practices associated with high performance in workplace safety and wellbeing
Workplace Complaints Standard	Reiterates and implements the Group's commitment to providing a fair, equitable, safe and productive work environment for workers and the timely and equitable resolution of workplace complaints
Recruitment and Selection Standard	Sets out our merit-based, equity and diversity-promoting, fair and transparent recruitment and selection process

Relevant anti-modern slavery extracts from our Supplier Code of Conduct

We have continued to reinforce to our suppliers our stringent requirements for ethical conduct via an update to the Responsible Supplier Code of Conduct. This acknowledges our sustainability ambitions, in ensuring we partner with likeminded organisations that share our values and maintain high ethical, social, and environmental standards.

The purpose of the Responsible Supplier Code of Conduct is to:

- Set out our expectations of our suppliers, supplier subsidiaries, subcontractors, and supply chains in the provision of goods and services.
- Supplement the contractual terms and conditions under which suppliers are engaged to supply goods and services to us.
- Support suppliers to identify, mitigate and manage sustainability risks whilst also identifying opportunities for innovation and change.

Below is an extract of the requirements in our Responsible Supplier Code of Conduct.

Element	Expectation
Modern Slavery	As appropriate, have in place policies and/or procedures that identify, mitigate, and manage any form of modern slavery within your operations and supply chain. This includes trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. For smaller organisations that may not be required to report under modern slavery legislation, we encourage you to take a targeted risk-based approach to modern slavery in the supply chain with a view to continuous dialogue and improvement
Workplace culture	Foster a workplace culture free from workplace bullying, harassment, victimisation and abuse. This includes, but is not limited to, verbal, physical, sexual or psychological abuse and harassment
Proactively address human rights obligations in your supply chain	Provide goods and services in a manner consistent with any applicable human rights obligations. Consistent with Commonwealth modern slavery legislation, we expect you to proactively identify and address modern slavery risks and maintain responsible and transparent supply chains. Modern slavery is defined broadly to include all forms of human trafficking, slavery like practices such as forced labour and debt bondage

Use of temporary and outsourced labour	Use temporary and outsourced labour within the limits of the law. You are therefore expected to use all reasonable endeavours to ensure that the third-party recruitment agencies you engage are compliant with the provisions of this Code of Conduct and applicable law. You are also responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third party agencies
Legislated entitlements	Ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays. You must pay workers' wages as required under applicable laws in a timely manner and not use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws
Grievance practices	Ensure that policies and practices are in place to allow violations, misconduct or grievances to be reported by workers without fear of victimisation or detrimental conduct
Self assess compliance	Proactively self-assess compliance with this Code of Conduct, take action to remedy any shortcomings and advise your key contact at Bolton Clarke of any non-compliance, as well as any improvement actions and plans
Procurement practices	Ensure adequate procurement processes are in place over your own supply chain to assess, select and execute supplier arrangements that meet this Code of Conduct

Strengthening our supplier contracts

All of our Supply Agreement templates include clauses on Modern Slavery. This includes the primary Supply Agreement templates, Purchase Order Terms & Conditions, Home Care Agreements, Contractor Agreements and Master Service Agreements. Our Request-For-Tender documentation also includes mandatory questions relating to modern slavery for consideration when evaluating tenders.

Our templates include robust provisions requiring suppliers to commit to compliance with the Bolton Clarke Responsible Supplier Code of Conduct and the Modern Slavery Act 2018 (Cth) and to develop, and implement policies and procedures to screen, identify, prioritise, respond and, if necessary, remediate modern slavery or the risks thereof in their operations.

Assessing the effectiveness of our actions

Review of actions taken over the FY2023/24 reporting period

Element	Action to be taken
Policy review	We have reviewed and updated the Modern Slavery Policy in line with our internal Policy review timeframes. We have updated and renamed our Supplier Code of Conduct to the Responsible Supplier Code of Conduct to reflect very specific Modern Slavery expectations.
Training	We have evaluated our training modules and are working on an updated version which will be mandated for completion by all Board, Executives and Leadership teams, and all operational personnel who may be engaged in supplier management.
Supplier engagement	We have had ongoing discussions with suppliers to improve their understanding and knowledge of our expectations when it comes to modern slavery and potential risk within their supply chain. This has included discussions during business reviews with suppliers in specific categories that have come under scrutiny in the media such as glove suppliers and labour hire exploitation
Due diligence	We have continued to practice supplier selection practices including a review of how each organisation is managing their modern slavery risk, particularly in high-risk categories. The largest review undertaken this year was in relation to uniform production, outsourced laundry and contract catering services.
Supplier questionnaire	Follow up on progress of actions identified in the supplier questionnaire for food and medical consumables from the previous year was undertaken. This will be an ongoing discussion with our preferred suppliers to ensure that focus remains on highest risk categories.

Looking forward - our focus in FY2024/25

Over the next year Bolton Clarke intends to focus on the following areas to continue to assess and address the risks of modern slavery practices occurring in its operations and supply chains.

Element	Action
Training	We have reviewed our training modules and to ensure accessibility and continued relevance we will be updating the training modules in 2024/2025. To ensure the program of training is not interrupted whilst the modules are being revised, a recommended program of training has been developed for Executive Leadership review.
Supplier engagement and due diligence	We will encourage our supplier base to review their supply chain for risks via our regular business reviews and tender processes. This will also extend to investigations based on published known risks as they emerge - such as was undertaken with the fresh produce supply chain when a wages underpayment complaint was reported with a fresh produce supplier.
Supplier questionnaire	We will issue our supplier questionnaire to ICT suppliers and Facilities Management suppliers for completion and review.
Supplier segmentation framework	Review of the supply chain risk assessment will be undertaken to confirm that the Top 5 highest risk categories and suppliers have been identified and have responded to the supplier questionnaire.

This joint Modern Slavery Statement was approved by the Board of RSL Care RDNS Limited as the parent entity of the reporting entities on 29 November 2024



Tony Crawford Chairman

[Home and Community Support](#) [Retirement Living](#) [Residential Aged Care](#)

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