



Modern Slavery Statement

Regis Healthcare Limited (ACN 125 203 054)

Year: 1 July 2023 - 30 June 2024

This Modern Slavery Statement is prepared and issued by Regis Healthcare Limited, ACN 125 203 054 (**Regis**) and is made pursuant to the *Modern Slavery Act 2018 (Cth)* in respect of Regis and its related bodies corporate (**Regis Group**).

Message from the Managing Director and CEO

Dear Stakeholders,

Regis is pleased to publish its fourth Modern Slavery Statement.

Regis is one of Australia's largest aged care providers and our highest priority is the care and wellbeing of our residents, clients and staff. We are acutely aware of how important it is to protect vulnerable members of the community, be they in Australia or in other countries.

Accordingly, in pursuing quality in our services we are also committed to taking action to eradicate Modern Slavery.

We supported the introduction of the *Modern Slavery Act* in 2018 and continue to promote its objectives, as embodied in our Modern Slavery Statement. We are committed to acting legally, ethically and with integrity at all times, both in our business relationships and when providing care to our residents and clients.

The Regis Group is committed to promoting Modern Slavery Compliance within our supply chains. Regis' Board of Directors approved our Modern Slavery Code of Conduct, which laid down the foundation and expectations for the conduct of the Regis Group and our suppliers.

We have implemented processes to ensure our internal business teams and suppliers are all working towards identifying current and potential risks in their supply chains and, if required, remediating instances of Modern Slavery in those supply chains.

This year has been one of consolidation with a focus on continuing to work towards all Regis Group suppliers accepting and complying with their Modern Slavery obligations while providing goods and services to Regis.

Regis thanks our valued suppliers for their support, transparency and co-operation in support of our Modern Slavery Compliance Framework. We look forward to continuing this work with our suppliers to further develop our framework and strengthen our capacity to actively manage and remediate potential Modern Slavery Risks and protect the most vulnerable members of our supply chains.

I trust you find this statement informative and we welcome feedback from our stakeholders.



Dr Linda Mellors
Managing Director and CEO

1. About Regis

Our Structure

Regis is an ASX listed company, incorporated in Australia with its national office in Melbourne, Victoria.

Regis' subsidiary companies include Regis Group Pty Ltd, Retirement Care Australia (Logan) Pty Ltd, Regis Aged Care Pty Ltd (Regis Aged Care) and CPSM Pty Ltd (CPSM), (together referred to as "Regis Group" or "us" or "we" or "our"). Regis Aged Care is the main operating entity in the Regis Group and the main acquirer of goods and services.

Our approach to Modern Slavery Compliance has been guided by our Board which has approved the Regis Modern Slavery Code of Conduct and this Modern Slavery Statement 2023 - 2024.

Consultation

This Modern Slavery Statement is made by Regis on behalf of itself and reporting entities in the Regis Group. Regis consulted with each entity it owns or controls to prepare this statement. This group-wide collaboration is achieved by the shared operational and executive functions and the Regis Board which are identical across all Regis Group entities.

Regis Aged Care Pty Ltd was assessed as having a slightly increased exposure to Modern Slavery Risks due to its role as the main operating entity in the Regis Group and the chief acquirer of goods and services. However, management functions are shared across the entire Regis Group including procurement, legal, risk, finance and people and culture. As such, all Regis Group entities are included, consulted and assessed in the actions taken in this reporting year.

Our Operations

Our principal services are the provision of residential aged care services (permanent and respite), Home Care services, Day Therapy centres and Retirement Village living. We are one of the largest and most geographically diverse private aged care providers in Australia. We employ over 11,000 employees.

As at 30 June 2024, we own and operate 67 residential aged care Homes across six states and the Northern Territory, with over 9,000 older people receiving services through our residential aged care Homes, Home Care service hubs, Day Therapy and Respite Centres, and Retirement Villages.

Further information about Regis and our operations can be found in the Regis Healthcare Annual Report 2024 at <https://www.regis.com.au/investor-information/publications/>.

Our Supply Chain

We acquire goods and services from over 650 suppliers. Our supply chain arrangements include suppliers from the following key areas:

- **Operational and Corporate Procurement**, including goods and services required for the care of our residents at our Homes, for our clients in our Home Care services, Retirement Villages and Day Therapy centres, and goods and services necessary to operate our National and State offices. The goods and services acquired include catering, cleaning and waste management, health related services, medical goods and equipment, uniforms, linen, recruitment, staffing including labour hire, information technology, stationery and office supplies and archiving services;
- **Professional Services**, including services to ensure compliance with the *Aged Care Act*, accounting and auditing services, consultants, recruitment services and legal services; and
- **Capital and Property Works**, including building materials and equipment and construction related services.

We recognise that our large number of suppliers makes undertaking due diligence of our supply chains important to ensure we do business with suppliers who share our values, ethics and approach to sustainable business practice and are aligned with our stance on Modern Slavery.

2. Identifying Modern Slavery Risks

Our Operations

We believe the risk of Modern Slavery in our directly employed workforce is very low. This is due to the highly regulated nature of the labour market in Australia, the strict regulation of aged care and nursing sectors, the presence of unions to represent employees, and our employees undertaking work in environments where there are established industrial policies and processes.

Our Supply Chain

We procure goods and services from a large number of suppliers. The goods and services we procure, range from uniforms and medical equipment to stationery and staffing through nursing agencies, information technology hardware and software and professional services.

From our very first Modern Slavery Statement published for 2020, we have continued to carry out high level risk assessments of suppliers, informed by guidance from the Department of Home Affairs and indicia applied by companies with similar portfolios to Regis in Australia and the UK in their risk assessments.

In our first year of Modern Slavery reporting, each key business team mapped out their material suppliers (being all suppliers who have an annual spend of over \$450,000). This enabled us to establish an initial baseline from which to undertake a risk assessment of any Modern Slavery Risks which exist, or potentially exist, within our material suppliers' organisations and respective supply chains. We identified a number of material suppliers who are either located in, or procure their goods from, High-Risk Countries and therefore met our threshold as a High-Risk Supplier. High-Risk Suppliers were requested to complete a Modern Slavery Questionnaire and to vary their contract with Regis to include our standard Modern Slavery Clause.

A significant number of our suppliers are located in Australasia. In our view, these suppliers have a lower risk of Modern Slavery occurring in their supply chains, as by virtue of their operational base in Australia, they are required to comply with the *Modern Slavery Act* within their own supply chains.

In the previous reporting year, we focused on our top 20 suppliers by revenue, High-Risk People & Culture Suppliers and information technology suppliers and worked with those suppliers to commit to identifying Modern Slavery Risks and surveyed the High-Risk suppliers from the previous reporting year.

This financial year, we focussed on our top 20 suppliers by revenue and completed an audit of new suppliers and existing High-Risk or material suppliers from the previous reporting year. This included surveying those without publicly available Modern Slavery reporting to gather further information about their actions to address Modern Slavery risk identified in their supply chains.

Case Study

During 2024, to better understand our supply chain, Regis met with key operations staff at our largest supplier of food and perishables to understand their own Modern Slavery procedures and the risk assessment they had completed on their own up-stream supply.

Regis compared the goods it procures from this supplier against the supplier's internal risk assessment and found that we were not procuring from any high or moderate risk categories and that the relevant supply chains for the Regis Group were assessed as low risk.

Actions undertaken this reporting year

a. Top 20 suppliers by revenue

This reporting year, we focused on our Top 20 suppliers by purchase value. We completed a desk-top audit to ensure the contractual arrangements with these suppliers include Regis' standard Modern Slavery clauses that require adherence to Modern Slavery laws and the Regis Modern Slavery Code of Conduct.

There were no other variations required to the existing contracts with ongoing suppliers, which indicates that the inclusion of Modern Slavery obligations have been successfully embedded in our regular procurement process.

We also reviewed the publicly available Modern Slavery reporting and Modern Slavery statements for ongoing suppliers. Two suppliers had not publicly reported on their supply chains and were asked to complete a Modern Slavery Self-Assessment Questionnaire (**Modern Slavery Questionnaire**). Regis received satisfactory responses from those two suppliers.

b. High-Risk People & Culture Suppliers

This reporting year, we reviewed our suppliers identified as High-Risk for our People & Culture function.

Two supplier organisations have contractually agreed to Regis' Modern Slavery program and successfully completed and returned Regis' Modern Slavery Questionnaires confirming that they have implemented appropriate steps in this reporting year to mitigate Modern Slavery Risks.

c. High-Risk Information Technology Suppliers

This reporting year, we contacted our information technology suppliers identified as High-Risk, material suppliers in the previous reporting year and asked them to complete the Modern Slavery Questionnaire. We issued a request to complete a survey to nine suppliers and received completed responses within the reporting timeframe from seven suppliers. The responses from these suppliers to the Modern Slavery Questionnaire indicate they have implemented appropriate steps in this reporting year to mitigate Modern Slavery Risks. We will continue to monitor and follow up with the remaining two suppliers who have not responded.

We also reviewed new information technology suppliers since the previous reporting year. Regis completed a desk-top audit to identify any suppliers who did not publicly report on their supply chain and/or whose contracts did not include Regis' standard Modern Slavery clauses that require adherence to Modern Slavery laws and the Regis Modern Slavery Code of Conduct. Based on their operations and location, none of these suppliers met Regis' criteria for High-Risk or the materiality threshold. We varied agreements with three suppliers to ensure the Regis Modern Slavery program was embedded in the contractual arrangements with these suppliers.

d. Other High-Risk Procurement Suppliers

We conducted a desk-top review of new supply agreements for the reporting year and made amendments to the terms with five suppliers to clarify their obligations in relation to Modern Slavery in supplying goods and services to the Regis Group, and had six suppliers complete a Modern Slavery audit self-assessment tool. All participating suppliers provided satisfactory responses to the survey.

3. Regis' Modern Slavery Compliance Framework

We are committed to acting ethically and with integrity in all our business relationships. This includes taking all reasonable steps to ensure that Modern Slavery does not exist in any part of our business or in our supply chains.

We expect our suppliers to share our commitment to act lawfully and ethically to ensure the same within their organisations and their supply chains.

In summary, our Modern Slavery Compliance Framework includes:

- Our Modern Slavery Code of Conduct;
- The provision of Modern Slavery training to staff to reinforce our compliance obligations;
- High level assessment and audit of the Modern Slavery Risks in our key suppliers and their supply chains; and
- The inclusion of Modern Slavery obligations in all our supply agreements.

Our Modern Slavery Compliance Framework ensures we continue to meet the commitments stated in our Modern Slavery Code of Conduct.

We have set out below in more detail what our Modern Slavery Compliance Framework entails.

A. Governance

Modern Slavery Code of Conduct

We have published our Modern Slavery Code of Conduct on our website at: <https://www.regis.com.au/modern-slavery-code-of-conduct/>. In summary, our Modern Slavery Code of Conduct sets out:

- a. our commitment to act ethically and with integrity in all our business relationships;
- b. the steps we will take towards eradicating Modern Slavery in all its forms both within our organisation and in our supply chains; and
- c. our minimum expectations of our suppliers, including:
 - i. opposing Modern Slavery in all its forms;
 - ii. paying fair wages in line with legislation and awards; and
 - iii. monitoring supply chains for Modern Slavery Risk.

B. Education and Training

To ensure awareness of Modern Slavery Risks and to reinforce our expectations of the standards of conduct that we expect of all our staff, we continue to provide Modern Slavery training for our key business teams who interact with, manage and procure goods and services from suppliers in our supply chains.

C. Standard Procurement Agreements, Due Diligence and Onboarding Process

Our standard form contractual arrangements and procurement processes include contractual obligations to address Modern Slavery Compliance including:

- a. adherence to the Regis Modern Slavery Code of Conduct;
- b. remediation actions including termination and suspension for breach of our Modern Slavery provisions; and
- c. providing Regis with the right to audit our suppliers and their respective supply chains to review their compliance with the above Modern Slavery related obligations,

together referred to as the **New Modern Slavery Provisions**.

Our tender and onboarding documents ensure we identify Modern Slavery Risks early with new suppliers and during our due diligence processes. Our standard procurement contracts require **all** new suppliers commit to adherence to the New Modern Slavery Provisions.

4. Evaluating the Efficacy of our Actions

We have corporate governance processes in place to ensure that we follow our Modern Slavery Compliance Framework. These processes include:

- reporting to our Board outlining the steps we have taken to follow our Modern Slavery Compliance Framework and maintain our Modern Slavery Compliance;
- the review of all new material supplier contracts by our Legal Team to ensure that Modern Slavery Risks are adequately addressed and our Modern Slavery Provisions are included in all new supplier contracts;
- spot checks of High-Risk Suppliers in relation to compliance with the Modern Slavery Code of Conduct and their Modern Slavery contractual obligations; and
- requiring regular meetings between the Procurement and Legal Teams to consolidate feedback from our business units and suppliers about existing risk assessment processes and potential new risks.

Case Study

Regis met the Procurement Team of its largest waste services provider in 2024 to better understand their supply chain in terms of both goods and services, including a review of their tier two providers.

Engagement with the supplier also identified opportunities to closer collaborate on sustainability and ensure greater transparency of the supply chain, which Regis will continue to pursue with the supplier.

5. Future Developments

In our upcoming reporting year, we aim to continue to revise and develop our approach to Modern Slavery Compliance to build capacity within the business to monitor and act on Modern Slavery Risks in supply chains.

A. Identifying Modern Slavery Risks

We expect to continue to monitor our supply chains in 2024-2025 and pursue opportunities to partner with major suppliers to identify areas of risk and opportunity.

B. Adapting our Modern Slavery Compliance Framework

Our Modern Slavery Compliance Framework is a living document, subject to further refinement and amendment in future years as a result of any learnings within our business and within the Australian corporate landscape.

