

Aurora Healthcare

# Modern Slavery Statement

July 2024

**People First. People Always.**

**Aurora**

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# About us

Established in 2005 as Healthe Care Australia, our organisation underwent a significant transformation in 2021, rebranding as Aurora Healthcare. Now, Aurora Healthcare stands as Australia's largest private specialty health care group, dedicated to mental health, rehabilitation, specialty medical, and community services.

## Mental health services

To help people on their mental and physical health care and wellness journey.

Your mental and physical health and wellness is a journey we take with you.

Aurora's local healthcare specialists take the time to understand your unique mental and physical needs, and provide a selection of innovative treatment options, to support you on your path to better health.

## Our Values

People first, people always. We are shaped by our values below.

## Our people first approach



### Care with compassion

We are patient-centred, taking the time to listen, learn and support our patients and coworkers



### Pursue excellence

We maintain the highest standards of ourselves, our colleagues and the services we deliver



### Guided by curiosity

We openly embrace new ideas, concepts, technology, treatments. We always want to know more and to try new ways of approaching our work



### Work collaboratively

We embrace diversity, cooperate, give and receive feedback, take on board team contributions and lift each other up to enable clinical excellence



### Empower patients & providers

We share with our patients and colleagues the time, support and tools required for optimal patient outcomes

## People First. People Always.

### Our Vision

A healthier and happier Australia  
...mind, body, spirit

### Our Purpose

To help people on their mental and physical health care and wellness journey

### Our Mission

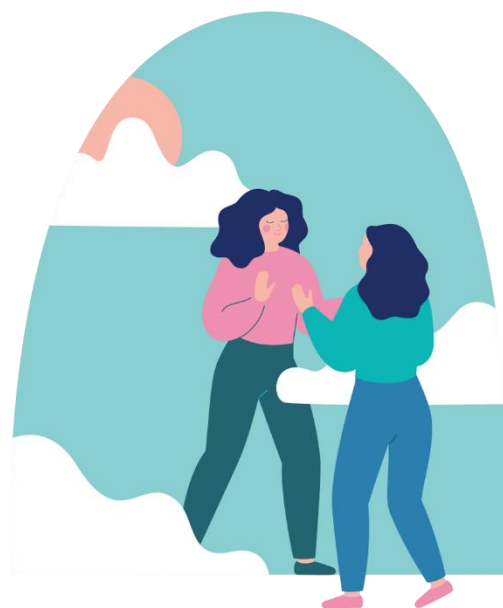
To work with and stand by our patients and our people, empowering them with real choice in their health care experience

# Modern Slavery: Aurora Healthcare's Approach

Aurora Healthcare Modern Slavery Statement (the **Statement**) is made pursuant to the requirements of the *Modern Slavery Act 2018* (Cth) (the **Act**). The Act was introduced by the Australian Government on 1 January 2019 and requires certain corporations and entities in Australia to publicly report on the risks of modern slavery in their operations and supply chains. This Statement sets out the actions and strategies taken by Aurora Healthcare to identify, assess and mitigate modern slavery risks within its own business and related supply chains for the 2024 financial (calendar) year reporting period (the **Reporting Period**).

Modern slavery comprises situations of serious exploitative work practices that represent violations of human rights, such as coercion, threats or deception. Examples of such exploitation as defined in the Act include servitude, forced labour, trafficking in persons, and the worst forms of child labour. The UN estimates that over 40 million people worldwide are victims of modern slavery, and of these victims, over half are in the Asia-Pacific region. In Australia, it is estimated that 4000 people are victims of modern slavery.

Considering the extent of modern slavery worldwide, Aurora Healthcare recognises that there is a high risk of its presence within our operations and supply chains. As such, we are committed to continuously improving our understanding of modern slavery risks and striving to identify, assess, and reduce these risks over time.



Aurora Healthcare is also aware of the UN Guiding Principles on Business and Human Rights (the **UNGPs**). The UNGPs serve as the international standard to prevent and address impacts on fundamental human rights in the context of businesses; one such human right is freedom from slavery. With an understanding of the UNGPs, Aurora Healthcare can more effectively establish a framework for preventing and addressing its modern slavery risks

# Mandatory Reporting Criteria 1 & 2:

*Identify the reporting entity and describe its structure, operations and supply chains*

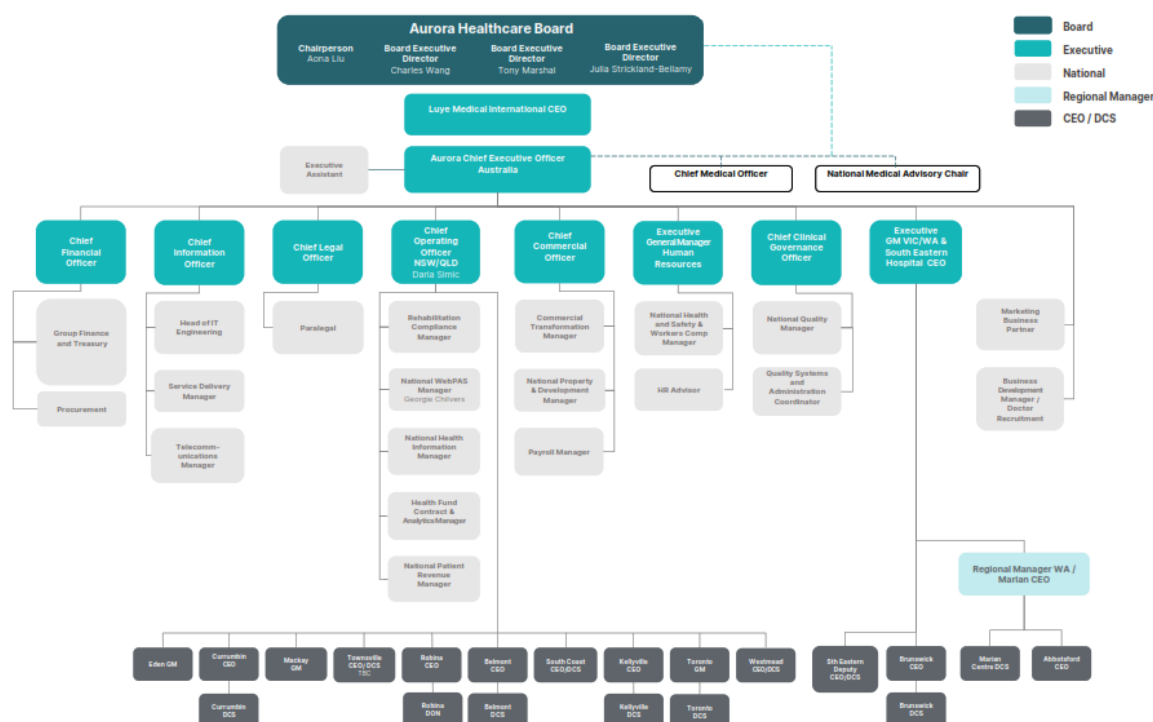
## Reporting entity structure and operations

This Statement relates to Aurora Healthcare Australia. Under the Act, Aurora Healthcare is a reporting entity as it is a company that conducts business in Australia with a consolidated revenue of over \$100 million during the Reporting Period.

Aurora Healthcare is a specialty private hospital group that specialises in mental health, medical and rehabilitation. With almost 1000 mental health beds, 450 rehabilitation/medical beds and a range of outpatient and day programs, Aurora Healthcare is one of Australia's largest private providers in the mental health and rehabilitation sectors. Aurora Healthcare's Australian corporate structure is set out below.

### Aurora Organisational Structure

**Aurora**



Monday, 12 August 2024

## Mental health services

Aurora Healthcare's team of highly qualified psychiatrists, medical, nursing and allied health professionals manage and treat a range of mental health disorders such as addictive disorders and trauma and dissociation. Specialty mental health offerings provided by our team include inpatient therapy programs, cognitive behavioural therapy, neurostimulation, and acute adult psychiatry.

## Rehabilitation treatment and programs

Aurora Healthcare offers inpatient, day patient and outpatient rehabilitation services.

Specialty therapies provided by Aurora Healthcare include physiotherapy, occupational therapy, psychology, exercise physiology, hydrotherapy, speech pathology, nutrition and dietetics, and social work and counselling. Such treatments are overseen by our experienced team of 200 credentialed physicians and geriatricians.

Aurora Healthcare's specialised rehabilitation programs include cardiac, falls and balance, lymphoedema, neurological, oncology, respiratory, stroke, and trauma.

## Integrated Mental Health (IMH)

In 2023, Aurora Healthcare entered a joint venture with Medibank Private (Medibank). Medibank is one of Australia's leading health insurers but has also diversified into partnering with healthcare providers to develop and deliver new innovative models of health care. IMH has two private mental health facilities specialising in short stay integrated mental health, with a third facility to open in late 2024.

## Aurora Healthcare has 16 hospitals and engages over 3000 staff, comprising corporate, hospital and executive staff.

Our Aurora Healthcare portfolio includes 16 private hospitals, clinics and community services across Australia, all dedicated to providing exceptional patient care.

- Abbotsford Private Hospital
- Belmont Private Hospital
- Brunswick Private Hospital
- Currumbin Clinic
- Deakin Private Hospital (IMH)
- Eden Private Hospital
- Hirondeille Private Hospital (IMH)
- Kellyville Private Hospital
- Mackay Private Hospital
- Marian Centre
- Robina Private Hospital
- South Coast Private Hospital
- South Eastern Private Hospital
- Toronto Private Hospital
- Townsville Private Hospital
- Westmead Rehabilitation Hospital

Further information about Aurora Healthcare is available on our website

<https://aurorahealth.com.au>



# Mandatory Reporting Criteria 3

*Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls*

## Our Corporate Governance

**As a provider of healthcare in Australia, Aurora Healthcare is aware of the need to ensure it has a strong corporate governance framework. The Board of Aurora Healthcare is actively involved in all aspects of Aurora Healthcare's corporate responsibility, including the review of detailed monthly risk and compliance reports prepared by the Executive.**

The risk and compliance reporting includes a section dedicated to supply chains (both goods and services) and a particular focus on having an in depth understanding of the origin of each supply chain and every third party involved in the supply chains.

The Aurora Healthcare Board has delegated responsibility to a select group of executives and national managers to identify, implement, monitor and report on Aurora Healthcare's modern slavery initiatives, policies and compliance. The group includes the Chief Commercial Officer, Chief Legal Officer and the National Procurement Manager.



# Aurora Healthcare Supply Chains

**Aurora Healthcare's supply chain consists of approximately 285 primary suppliers and wholesalers in the healthcare industry.**

Set out below is a list of the primary categories of suppliers and the risk matrix.

Category	Number of Suppliers	Risk Matrix
Corporate services	70	<i>Low Risk</i> – the majority of the services are located in Australia.
Facilities / Hospitals	104	<i>High Risk</i> – numerous services relate to manual labour and goods that could be impacted modern slavery conduct
Food & Beverage	49	<i>Moderate</i> – all goods sourced from Australian suppliers. Labour practices are a risk.
Medical Consumables & Equipment	53	<i>High Risk</i> – consumables and equipment supplied from outside of Australia, including jurisdictions with known issues associated with modern slavery practices.
Utilities	9	<i>Low Risk</i> – all sourced from Australia and substantially from large public companies with significant corporate compliance obligations.
Information Technology	60	<i>Moderate Risk</i> – the majority of providers are located in Australia. Aurora Healthcare is governed by stringent laws and regulations regarding the use of third party IT/software providers.



# Operational Risks

## Overview

**Aurora Healthcare provides a variety of services to its patients (and staff), including clinical (nursing) services, hospitality services, allied health services, program facilitation services, pharmacy services, imaging services and pathology services.**

A significant number of services provided (or facilitated) by Aurora Healthcare have or relate to a service or provision of goods that in some ways are impacted or influenced by third parties located outside Australia. Given the increasing number and diversity of global trade arrangements, it is more important than ever to ensure that supply chain diligence is maintained and reviewed on a regular basis.

In addition, given that Aurora Healthcare owns and operates 16 private hospitals in Australia, Aurora Healthcare is aware of the need to ensure corporate oversight in relation to the groups procurement policies and relationships with third party providers. Accordingly, Aurora Healthcare has, where possible, entered into group wide procurement agreements consistency and compliance, including modern slavery laws and regulations.

## Our People

Aurora Healthcare is committed to maintaining an equal opportunity workforce that encourages workplace diversity. Aurora Healthcare employs the vast majority of its human resources directly, lowering the risk of modern slavery occurring within our workforce. Aurora Healthcare has a modern and transparent recruitment policy that is overseen by an experienced Human Resources team. Aurora Healthcare takes seriously its obligations as an employer to ensure it maintains a safe and respectful workplace and compliance with all relevant employee and workplace related laws and regulations.

In addition, the majority of our staff are registered and enrolled nurses, and their qualifications and credentials are checked on commencement of employment and kept up to date in accordance with Aurora Healthcare's by-laws and relevant industry regulations. As a general rule, all Aurora Healthcare staff are located in Australia and our healthcare workers (the majority of employees employed at one of our hospitals) are employed under Modern Awards or Enterprise Agreements in accordance with the Fair Work legislation.



# Mandatory Reporting Criteria 4

*Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.*

**Aurora Healthcare holds itself to the highest ethical and professional standards and accepts its responsibility to maintain human rights and a sustainable work environment. As such, Aurora Healthcare is fully committed to working with employees, contractors and suppliers to effectively identify and address modern slavery risks. A strong focus is placed on due diligence checklists and reviews as well as implementing remediation frameworks both within the business and in supply chains.**

There are several ways in which Aurora Healthcare has addressed its modern slavery risks. These are outlined as follows.

## Supplier engagement

Aurora Healthcare endeavours to engage with reputable suppliers who are equally committed to identifying and mitigating risks of modern slavery in their supply chains. In doing so, significant consideration will be given to the reputation, consistency and quality of those suppliers before entering commercial arrangements with them.

Before entry into a supplier arrangement, it is a common practice for Aurora Healthcare to request information regarding the modern slavery process and procedures followed by those suppliers. Aurora Healthcare attempts to make it clear that such information is of high importance in any tender process.

Aurora Healthcare also places high value on long-term partnerships and strives to focus on this aspect rather than the prospect of short-term commercial gain. As a result, we hope to minimise the risk that our own conduct and commercial practices inadvertently contribute to modern slavery practices.



## Employee engagement

Aurora Healthcare has several avenues in which a person may provide feedback regarding our business operations. For instance, the Aurora Healthcare website invites queries and complaints, and employee/patient satisfaction surveys are conducted. These channels offer employees, patients, suppliers and members of the public the opportunity to report any instance or risk of modern slavery they may be aware of. No such reports have been received to date.

Our Human Resources department oversees the process of hiring staff at Aurora Healthcare. Upon being hired, all employees are issued an employment contract and an employee handbook which includes the relevant policies, including the Grievance Policy, the Whistleblower Policy and the Complaint Management Policy. Employee understanding and compliance with these policies ensures that any risk of modern slavery in the workplace will be reported.

Given the majority of Aurora Healthcare's employees are employed under a Modern Award or a registered Enterprise Agreement, their employment terms and conditions are regularly reviewed and updated, both internally and externally, resulting in limited risk that employment conditions do not comply with relevant laws, regulations and standards.

## Current actions

In a continuous effort to manage modern slavery risks, Aurora Healthcare plans to take the following future steps:

- a. Embed modern slavery awareness into our Risk Management framework and associated policies

- b. Review contractual reporting requirements to promote a transparent system of reporting in our supply chains
- c. Implement a modern day slavery supplier questionnaire to be provided for all suppliers
- d. Assess the supply chain to identify risks of modern slavery
- e. Develop an employee training module on modern slavery to increase employee awareness of modern slavery risks in Aurora Healthcare's operations and supply chains
- f. Assess the modern slavery statements provided by our suppliers.

## Remediation

Aurora Healthcare 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 assist in addressing harms to people and to address future risks if Aurora Healthcare is found to have caused or contributed to modern slavery. This approach includes incorporating specific remediation provisions in procurement agreements with third party suppliers that look to place the onus on the suppliers actively engage in remediation outcomes in circumstances where that supplier is directly or indirectly connected to incidences involving modern slavery.

In the event that suspicions of modern slavery practices are notified through whistleblower processes or other channels, Aurora Healthcare staff will contact relevant law enforcement agencies

# Mandatory Reporting Criteria 5

*Describe how the reporting entity assess the effectiveness of such actions.*

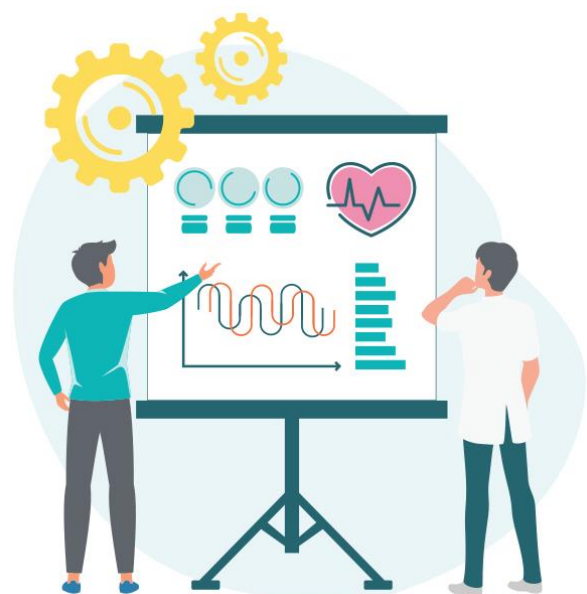
**During the current reporting period (1 July 2023 to 30 June 2024), Aurora Healthcare has focused on understanding and establishing a number of new risk practices that have, to a certain extent, shifted as a result of the ‘new norms’ arising out of COVID-19. One area of concern has been the rising number of fraudulent business activities, in particular those related to international transactions.**

Given Aurora Healthcare is already subject to additional regulatory and compliance conditions associated with its ownership structure, the Board of Aurora Healthcare is particularly sensitive to the impact that COVID-19 has had on international dealings and it has focused on strengthening Aurora Healthcare’s diligence processes when engaging with third party suppliers (both in Australia and overseas). Issues such as “debt bondage” have become a major issue in many countries and poses additional challenges to Australian companies monitoring and reporting on supply chain risk.

Aurora Healthcare is in the process of introducing additional safeguards in its supply contracts which require more stringent reporting from third parties involved in Aurora Healthcare supply chains, including disclosure, representations and warranties relating to post COVID working conditions and arrangements, such as “debt bondage”.

The success of Aurora Healthcare’s policies and actions is being monitored by the Board with regular updates from the risk and compliance executives and national procurement managers, including updates relating to new risks being identified by international and domestic regulators to ensure Aurora Healthcare’s policies remain current and effective.

Thankfully, Aurora Healthcare has not become aware of any incidents involving modern slavery, either directly or indirectly relating to its business activities. Accordingly, it is perhaps difficult to accurately assess the effectiveness of our modern slavery policies and actions but nonetheless the Board remains committed to ensuring that Aurora Healthcare continues to focus on maintaining and further developing its modern slavery assessments, actions and reporting, including working with Australian authorities and regulators as necessary.



# Mandatory Reporting Criteria 6

*Describe the Process of Consultation with Any Entities the Reporting Entity Owns and Controls.*

**Although Aurora Healthcare owns and operates a number of private hospitals throughout Australia, that are themselves owned and operated by separate subsidiaries of the reporting entity, all Aurora Healthcare hospitals are effectively governed as part of one group in relation to risk and compliance.**

Accordingly, all policies relating to risk and compliance, including modern slavery, are 'Group' policies that must be adopted and implemented by all hospitals and associated business units within the Aurora Group. All reporting is Group reporting which is consolidated by National Risk and Compliance Managers with various portfolios and reported to the National Executive and ultimately the Board. This is a cross-functional exercise involving all areas of operation and risk, including legal, Human Resources, procurement, company secretary, information technology, clinical operations and compliance.

In addition to the Group approach to engaging with suppliers, all hospitals and business units within the Aurora Group are required to consult with the National Procurement Manager prior to entering into any supply arrangements (if not Group arrangements) to ensure appropriate diligence is carried out and steps taken to identify and monitor risk.

Aurora Healthcare is in the process of implementing an education program via its mandatory training scheme for all senior executives at Aurora Healthcare's hospitals and within Aurora Healthcare's corporate offices to ensure a broader understanding of risks associated with third party dealings, including modern slavery.



# Mandatory Reporting Criteria 7 – Other

Aurora Healthcare, and in particular the National Executive and the Board, are satisfied that Aurora Healthcare, as a “Reporting Entity” has covered the six mandatory reporting criteria set out in the Modern Slavery Act 2018 (Cth).

Aurora Healthcare will continue to monitor specific guidance published by the Commonwealth to ensure ongoing reporting compliance and implantation of best practice.

The Reporting Entity is Aurora Healthcare Pty Ltd (**Aurora Healthcare**). This Modern Slavery Statement is prepared and submitted by Aurora Healthcare for itself and on behalf of its Australian registered Related Bodies Corporate, including its hospital subsidiaries as set out in the Aurora Healthcare (trading) corporate structure below.

## Aurora Healthcare Australian Structure Chart

