

# MODERN SLAVERY STATEMENT 2025





# MESSAGE FROM THE CEO

RetireAustralia continues to strengthen its commitment to identifying and addressing the risks of modern slavery across our operations and supply chains. As a developer, owner and operator of retirement communities in Australia, we acknowledge our responsibility to uphold business practices that reflect high standards of quality, safety, and integrity.

Over the past year, we have made meaningful and measurable progress against our three-year continuous improvement plan. This includes:

- The delivery of Modern Slavery Awareness presentations at Care, Operations and Sales meetings, helping to deepen internal understanding of the risks and responsibilities we all share.
- Launching a dedicated supplier page on our external website, reflecting our focus on building strong, ethical partnerships with suppliers who share our commitment to quality, safety, and integrity. This page provides essential information and documentation that all suppliers must review and comply with when working with us.
- Continuing to advance our broader Environmental, Social and Governance (ESG) focus through a clear strategy and long-term roadmap. This framework supports our journey toward enhanced governance, transparency and compliance through to 2028, that our commitments are both sustained and strengthened over time.

We reinforce our commitment to the *Modern Slavery Act 2018 (Cth)* and the standards underpinning the *United Nations Guiding Principles on Business and Human Rights* by embedding modern slavery risk management into our business operations and supply chain practices. We acknowledge that no organisation or industry is immune to the risk of modern slavery, and we take our responsibility to act seriously.

This Statement outlines the steps we are taking to identify, prevent, measure, mitigate and address modern slavery risks. We believe that education, transparency and accountability are key to ensuring ethical practices across all areas of our business. To the best of my knowledge the information provided in this Statement is accurate and complete, and appropriately reflects our current practices, standards and organisational commitments.

We will continue to build on these foundations, recognising that the journey to eliminate modern slavery is ongoing, and one that requires continued vigilance, collaboration and action.



**Dr Brett Robinson**  
Chief Executive Officer



# Mandatory criteria

Set out below is a schedule of the mandatory information criteria for a Modern Slavery Statement under the *Modern Slavery Act 2018 (Cth)* (the **Act**) and the location of the relevant information in this statement.

Criteria	Reference in the Act	Location in Statement
Identify reporting entity or entities covered by the Statement	s.16(1)(a)	Section 2
Describe the structure, operations and supply chains of the reporting entity	s.16(1)(b)	Sections 2,4,5
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	s.16(1)(c)	Section 6
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	s.16(1)(d)	Section 7
Describe how the reporting entity assesses the effectiveness of such actions	s.16(1)(e)	Section 7, 8
Describe the process of consultation with any entities the reporting entity owns or controls and in the case of a reporting entity covered by section 14 the entity giving the statement	s.16(1)(f)	Section 3
Include any other relevant information	s.16(1)(g)	Sections 1, 8
Details of approval of relevant principal governing bodies	s.16(2)(b)	Section 2



# CONTENTS

- 1 | INTRODUCTION
- 2 | ABOUT RETIREAUSTRALIA
- 3 | CONSULTATION
- 4 | OUR OPERATIONS
- 5 | OUR SUPPLY CHAIN
- 6 | MODERN SLAVERY RISKS IN  
OPERATIONS & SUPPLY CHAIN
- 7 | ACTIONS TAKEN & EFFECTIVENESS
- 8 | LOOKING AHEAD

# 1

# INTRODUCTION



# Introduction

## Our values, Code of Conduct and policies

Our values, Code of Conduct, and policies define the behavioural standards and expectations for everyone working at and with RetireAustralia. They offer clear guidance on how we conduct ourselves across all areas of the organisation.

RetireAustralia is committed to ethical and transparent practices in all aspects of our operations. This includes how we engage and manage our employees (workers), contractors, volunteers, and consultants, as well as our efforts to reduce the risk of modern slavery in our supply chains.

Every RetireAustralia worker, volunteer and contractor is responsible for understanding the ethical, legal, and policy requirements relevant to their role, and for reporting any suspected breaches of the law, the Code of Conduct, or company policies.

Our executives and leaders play a critical role in fostering a workplace culture of compliance and ethical conduct where these values are not only expected but encouraged.

Compliance with key policies and procedures is delivered and tracked via our online learning system, which provides leaders with regular updates on team members with overdue or pending compliance training needs.

### Our values

Our values shape how we operate and the standards to which we hold ourselves accountable. They are:

<b>One Team</b>	<b>Leadership</b>	<b>Excellence</b>	<b>Respect</b>	<b>Integrity</b>
We work collaboratively, embrace learning, and focus on solutions.	We are forward-thinking, courageous, and take responsibility with commitment.	We pursue continuous improvement and prioritise safety in everything we do.	We are empathetic to the needs of others and aim to make a meaningful impact.	We are honest, keep our promises, and report issues responsibly.

We integrate these values into every aspect of our business—including our commitment to preventing and reducing modern slavery risks in our operations and supply chains.

As **One Team**, we collaborate with our employees and supply chain partners to identify and address risks related to modern slavery.

We take a **Leadership** role in educating and guiding our workers, volunteers and suppliers to understand their obligations under the Act and to support us in fulfilling our responsibilities.

With a focus on **Excellence**, we continually seek ways to monitor, manage, and reduce modern slavery risks and advance the implementation of our Continuous Improvement Action Plan outlined in Section 8.

We act with **Respect** for every person across our communities, workplaces, and supply chains.

Guided by **Integrity**, we are doing our best to ensure we do not ignore wrongdoing or prioritise commercial interests over human rights.

Through the use of value shares and nominations at the commencement of regular meetings, morning teas and information sessions, our leaders regularly enforce the importance of our ethics in our everyday decision making.

## Code of Conduct

Our Code of Conduct defines the standards for our behaviour, communication, and decision-making. It helps to ensure a consistent approach to ethical, legal, and compliance matters. As part of our Continuous Improvement Action Plan, we are currently updating the Code to include the *United Nations Guiding Principles on Business and Human Rights*. All employees, including the board, executive leadership team, consultants, and contractors, are provided these on commencement and undertake annual refresher training.

## Policies

Our policies govern critical aspects of how we work, reinforcing the importance of ethical and lawful behaviour. Some of these policies include, Privacy Policy, Anti-Discrimination Policy, Code of Conduct, Diversity Policy, Employee Relations Policy, Equal Opportunity Policy, Prevention of Harassment and Bullying Policy, Prevention of Sexual Harassment Policy, Whistleblower Policy and the Procurement Policy. These documents outline key roles and responsibilities and are reviewed annually to ensure alignment with best practices and applicable regulatory standards.



2

# ABOUT RETIREAUSTRALIA





# About RetireAustralia

In accordance with the Modern Slavery Act, RA (Holdings) 2014 Pty Limited ACN 603 289 792 (**RetireAustralia**), and its wholly owned subsidiary, RA 2014 Pty Limited ACN 603 311 619 , with their registered office at Level 4, 200 Mary Street, Brisbane, Queensland 4000, Australia, jointly issue this Statement.

The following list of entities operating in Queensland, New South Wales and South Australia make up the RetireAustralia Group.

## Entities comprising the RetireAustralia Group

30 Andrew Avenue Pty Ltd <sup>2</sup>	Lifestyle Care Services Pty Limited
Aberdeen (N.S.W.) Pty Limited	Lifestyle Consolidated Pty Limited
Barton Vale Pty Limited	Lifestyle Holdings (NSW) Pty Limited
Bartonvale Consolidated Pty Limited	Lifestyle Management Services Pty Limited
Bartonvale Holdings (SA) Pty Limited	Lifestyle Property Services Pty Limited
Bartonvale Lodge Pty Limited	Lincoln Grove Estate Partnership
Boambee Gardens – Coffs Harbour Pty Limited	Lincoln Grove Estate Pty Limited
Boambee Gardens Estate Partnership	Manor Group Consolidated Pty Limited
Carlyle Gardens Retirement Village Bargara Pty Limited	Manor Group Holdings (QLD) Pty Limited
Coull Trust 1	MEP Trust <sup>3</sup>
Drayton Villas Pty Limited	Murray Gardens Estate Unit Trust
Errol Investments Pty Limited	Murray Gardens Retirement Estate Pty Limited
Forresters Beach Partnership	Noyea Operations Pty Limited
Gannon Consolidated Pty Limited	Noyea Pty Limited
Gannon Estates Pty Limited	Palm Gardens Consolidated Pty Limited
Gannon Holdings (SA) Pty Limited	Palm Gardens Holdings (SA) Pty Limited
Gannon Retirement Services Pty Limited	Quantivale Pty Limited
Gannon Retirement Trust	RA (Holdings) 2014 Pty Limited
Glengara Unit Trust	RA 2014 Pty Limited
Glengara Village Pty Limited	Lifestyle Care Services Pty Limited
Glengowrie Estate Pty Limited	Retire Australia (Ashgrove) Pty Ltd
Glengowrie Estate Unit Trust	Retire Australia (Burleigh) Pty Ltd
Hatway Holdings Pty Limited	Retire Australia (Lutwyche) Pty Ltd

Krogate Management Pty Limited	Retire Australia (Palm Gardens) Pty Limited
Laurels Estate Partnership	Retire Australia (Palm Gardens) Unit Trust
Retire Australia (Tarragindi) Pty Ltd	Riverina Gums Settlement
Retire Australia (Yeronga) Pty Ltd	Scarborough Estate Trust
Retire Australia Care and Services Pty Ltd	Scarborough Mews Estate Pty Limited
Retire Australia Finance Pty Ltd	Spring Grove Estate Pty Limited
Retire Australia (Graceville) Pty Ltd	Spring Grove Partnership
Retire Australia Management No. 2 Pty Limited	Stevens Holdings Trust <sup>1</sup>
Retire Australia Management Pty Limited	Stevens Nominees (Sydney) Trust
Retire Australia Sales (QLD) Pty Limited	Tarragal Glen Retirement Village II Pty Limited
Retire Australia Tarragindi Trust <sup>2</sup>	Tarragal Glen Retirement Village III Pty Limited
Retire Australia Unit Trust No. 3	Tarragal Glen Retirement Village Pty
Retire Australia Unit Trust No. 4	Tea Tree Gardens Holdings Pty Limited
Retire Australia Unit Trust No. 5	The Glen Group (NSW) Pty Limited
Retire Australia Unit Trust No. 6	The Manor Group Pty Limited
Retire Australia Unit Trust No. 7	Tincture Press Pty Limited
Retire Australia Unit Trust No. 8	Torrens Grove Partnership
Retire Australia Unit Trust No. 9	Ultimate Staff Suppliers Pty Limited
Retire Australia Unit Trust No. 10	Wellington Manor Pty Limited
Retire Australia Unit Trust No. 11	Wood Glen Retirement Village Pty Limited
Retire Australia Unit Trust No. 12	Wytown Trust <sup>1</sup>
RetireAustralia (Lane Cove) Pty Ltd	Yeronga Heart Pty Ltd <sup>2</sup>
Riverina Gums Estate Pty Limited	

<sup>1</sup>No equity is held in these entities and all beneficial rights are attributable to the RetireAustralia Group.

<sup>2</sup> These entities are joint ventures and or the RetireAustralia Group owns less than 100%.

<sup>3</sup> This entity has an independent trustee.

RA (Holdings) 2014 Pty Ltd & RA 2014 Pty Ltd have a consolidated revenue in excess of \$100M. No other entity in the RetireAustralia Group has a consolidated revenue of over \$100M.

Since 2014, RetireAustralia has been jointly owned by Infratil Limited and New Zealand Superannuation Fund.

RetireAustralia and its subsidiaries are governed by a board of non-executive directors with expertise spanning healthcare, property development, corporate finance and business

development. We currently manage 29 retirement villages with over 4,000 homes across New South Wales, Queensland and South Australia. We directly employ over 520 workers across these locations.



# 3

# CONSULTATION



# Consultation

RetireAustralia maintains oversight of the operations of all entities it owns or controls, as listed in Part 2 of this Statement. Most of these entities are wholly owned subsidiaries, and there is substantial overlap in management personnel across the group. Governance and organisational risks are discussed at board meetings, audit committee meetings and other formal meetings between RetireAustralia and the officers and boards of these entities, ensuring alignment on key operational matters. While formal consultation with these entities, including partnerships, was not undertaken specifically for the preparation of this Modern Slavery Statement, their operations and supply chains are fully integrated with those of RetireAustralia. As such, the actions and risk mitigation strategies described in this Statement apply collectively across the group.

Modern slavery risks and the steps taken by RetireAustralia to identify and mitigate them are regularly discussed at an operational level, including during monthly procurement induction sessions and at state care, operations, and sales meetings.

# 4

## OUR OPERATIONS





# Our operations

RetireAustralia is a leading private owner, operator and developer of retirement villages in Australia. Our purpose is to create thriving communities where older Australians live the life they choose in their own home. Our vision is to be a leading provider of integrated care and independent living communities for older Australians.

As of 31 March 2025, our portfolio consists of 29 retirement villages, across New South Wales, Queensland and South Australia. Our communities offer a comprehensive range of care and living options that integrate independent living with home care services and on-site higher acuity care facilities.

*Table: Overview of our core operations\**

  
**29 retirement villages**

  
**5,527 residents**

  
**4,354 homes**

  
**520 employees**

  
**504 residents accessing  
RetireAustralia Home  
Care\*\***

  
**249 homes under  
construction**

*\*As of 31 March 2025*

*\*\*This includes fee for service and government funded RA home care customers*

We are actively involved in the resale and refurbishment of units within established communities, as well as the development and sale of new units in our growing portfolio of retirement communities. During the financial year ending 31 March 2025, we refurbished and resold 374 units and completed the sale of 56 new units to incoming residents.

We also operate a home care business, RetireAustralia Home Care Services (RetireAustralia Care and Services Pty Ltd), that provides home care services exclusively to residents within our villages in New South Wales, Queensland and South Australia.

As a business, we have three main areas of focus in our operations:

**We're dedicated to providing an exceptional resident experience.**

Our communities are run with care, experience and passion. We work hard to ensure residents can live the life they choose in their own home, supported by seamless support and care pathways and quality age-friendly homes. We're focused on ensuring residents and their families have a positive experience when moving into, living in and leaving one of our communities. We're upfront about our offering, so from the day residents move in, they have

peace of mind knowing exactly what they are paying for and the lifestyle, care and support they can expect.

### **We enable a nimble and empowered workforce.**

Providing quality service to residents takes a richly skilled team, and one with a deep sense of conviction in our purpose and vision. At the core of our nimble and empowered workforce is a strong commitment to our people. We encourage our team members to work dynamically and with simplicity to meet performance expectations while consistently upholding our culture of care and our values of leadership, integrity, respect, one team and excellence, which form the foundation of all our actions, behaviours and decisions.

### **We are growing an optimal portfolio of retirement communities.**

We are developing new retirement communities in metropolitan areas while consistently optimising our established retirement communities to ensure they provide high-quality retirement lifestyles, with choices in care and support available to residents when needed. Our new villages are contemporary in design, integrated with the surrounding community and have age-friendly features making them perfect for now and ideal for later.

## **Our governance framework**

We're committed to good governance. A board of non-executive directors, with expertise spanning healthcare, property development, corporate finance and business development, governs the way we operate. The following board committees assist with providing governance and oversight:

- Audit Committee
- Clinical and Care Governance Committee
- Remuneration Committee

All directors, executives, and team members are required to meet standards of conduct and behaviour set out in our Code of Conduct. Failure to comply with these standards may lead to disciplinary action, including termination of employment, in accordance with our internal policies.

Our executive leadership team includes the Chief Executive Officer and leaders who are accountable for:

- Care and Operations
- Culture and Strategy
- Information and Technology
- Development and Acquisitions
- Finance
- Sales, Marketing and Communication.

Most of our retirement villages also have a resident committee, and we work closely with residents' families and advocates.

5

# OUR SUPPLY CHAIN





# Our supply chain

RetireAustralia partners with a broad range of suppliers to support the operation and development of our retirement communities. Our procurement activities span various categories including construction and refurbishment services, food and grocery supply, healthcare equipment, furniture, fleet leasing, and professional services. We recognise that our supply chain may present varying levels of risk for modern slavery, particularly where subcontracting is used or products are sourced from international suppliers with limited transparency.

To better understand and manage these risks, during the FY25 reporting period, we undertook a focused engagement with our top ten high-spend and high-risk suppliers (identified in Appendix A). Each was asked to complete a structured Modern Slavery Awareness and Risk Management Questionnaire. The insights gathered revealed a diverse range of maturity in supplier practices. While several suppliers have robust governance frameworks in place—including modern slavery policies, employee training, whistleblower mechanisms, and due diligence programs—others, particularly small to medium-sized enterprises, are in earlier stages of formalising their risk management. Several suppliers identified key risk areas such as the use of subcontractors in construction, offshore manufacturing in the furniture and food sectors, and the difficulty of maintaining visibility over tier 2 and 3 suppliers.

In response, RetireAustralia is strengthening its approach to supplier engagement and ethical sourcing. This includes enhancing supplier onboarding by incorporating targeted modern slavery risk assessment questions into our tender documentation, helping to identify suppliers operating in high-risk sectors or regions, or those lacking adequate labour rights policies. These questions support early identification of potential risks and enable more informed decision-making during the procurement process. In parallel, we are continuously improving our supplier onboarding through updates to the ComplyFlow registration platform, integrating modern slavery clauses into our standard form contracts, and providing guidance and support to suppliers through targeted communications. These communications explain the requirements of the Modern Slavery Act and clarify the shared responsibilities of both RetireAustralia and our suppliers. These actions reflect our commitment to responsible procurement and our goal of ensuring that modern slavery has no place in our operations or supply chains.

# 6

# MODERN SLAVERY RISKS

IN OPERATIONS &  
SUPPLY CHAIN



# Modern Slavery risks in operations and supply chain

RetireAustralia recognises that modern slavery can occur in many forms and across a wide range of sectors and geographies. While the risk of modern slavery within our direct operations is considered low—given our operations are based in Australia and our workforce comprises predominantly directly employed, professional staff—there are areas within our supply chain and outsourced services that may pose a higher risk.

## Our operations

RetireAustralia has not identified any instances of modern slavery within our operations during the last financial year.

We recognise that our workforce includes individuals who may be more vulnerable to exploitation. As of 21 May 2025, this includes 101 visa holders, 182 part-time employees, and 123 casual employees. RetireAustralia takes proactive measures to protect all workers and prevent the risk of modern slavery within our operations. These measures include:

- Complying with all applicable Australian employment, industrial relations, and human rights laws
- Ensuring all workers are engaged under formal contractual agreements
- Maintaining and applying robust internal policies, principles, and practices
- Providing workers with clear information about their rights and access to grievance and reporting channels
- Providing annual refresher compliance training for all team members
- Undertaking annual remuneration reviews to ensure compensation aligns with legislative and award requirements
- Conducting due diligence during onboarding, by collecting of identification and confirming legal working rights for all new employees
- Performing quarterly audits on Visa Entitlement Verification Online (VEVO) to ensure ongoing compliance with visa conditions and right-to-work status
- Maintain robust payroll systems, reconciling timesheets and wage records fortnightly, and promptly addressing any discrepancies.

## Our supply chains

As a developer, operator, and service provider in the retirement living and aged care sector, RetireAustralia's operations depend on a wide range of goods and services. These include:

- construction and refurbishment services
- food and grocery supply
- furniture and healthcare equipment
- professional healthcare services (e.g., physiotherapy, podiatry)
- facilities management and maintenance
- fleet management and logistics.

Certain sectors—particularly construction, furniture manufacturing, and food supply—are recognised nationally and internationally as higher-risk industries for modern slavery due to factors such as:

- reliance on subcontracted or low-skilled labour
- complex and opaque global supply chains
- sourcing of materials or products from regions with weak labour protections.

In FY25, RetireAustralia engaged with its ten highest-spend and high-risk suppliers (identified in Appendix A) via a structured Modern Slavery Risk Management Questionnaire. Responses indicated varying levels of maturity in modern slavery governance:

- Most suppliers acknowledged potential risks in their industries, particularly where subcontractors or international manufacturers are involved.
- Several construction and refurbishment suppliers highlighted challenges with oversight of labour hire agencies and complex subcontracting arrangements.
- Furniture and healthcare equipment suppliers noted exposure to overseas manufacturing, where forced labour risks may be elevated.
- Food service providers identified potential risks in offshore agricultural supply chains, particularly in developing countries.

Despite these challenges, many suppliers have implemented preventative measures, including:

- modern slavery policies and training programs
- ethical sourcing protocols and supplier questionnaires
- background checks and contractual clauses prohibiting exploitative practices
- whistleblower and grievance mechanisms for raising concerns.

Some smaller suppliers—particularly in refurbishment and professional services—acknowledged they are at early stages of formalising their approach and are working to introduce policies, training, and due diligence processes.

RetireAustralia conducts formal procurement exercises to identify and engage suppliers of key products such as building materials, fixtures and fittings, aged care consumables, food items, hardware, catering equipment, and technology, including Personal Emergency Response Systems (PERS). These categories are recognised as carrying a higher risk of modern slavery due to complex global supply chains and manufacturing practices. By centralising the sourcing of these higher-risk products, RetireAustralia helps to reduce the modern slavery risks faced by our smaller contractors—such as builders, tradespeople, and installers—who rely on these materials to deliver their services but may not have the resources to undertake their own due diligence. This approach supports ethical procurement across the broader supply chain and strengthens our collective responsibility to minimise harm. Please refer to Appendix A for a summary of the questionnaire responses.

## RetireAustralia's risk profile

Based on the above, the most salient modern slavery risks within RetireAustralia's operations and supply chain are:



- Labour exploitation through subcontracting in the construction and refurbishment of village units.
- Indirect exposure to modern slavery through imported goods such as aged care furniture, fixtures, and groceries.
- Limited visibility into tier 2 and tier 3 suppliers, particularly in global supply chains where raw materials or components may be sourced from high-risk regions.

## Mitigation and monitoring

To address these risks, RetireAustralia continues to enhance its procurement and supplier engagement practices. Key mitigation activities include:

- Prioritising engagement with high-risk suppliers – including active management of their contracts and Key Performance Indicators, ensuring their staff and subcontractors have access to a grievance mechanism and access to the RetireAustralia Whistle-blower process.
- Strengthening supplier onboarding procedures and contractual requirements – including continuous improvements to tender schedules, agreement terms and conditions, and to the ComplyFlow platform's registration.
- Supporting suppliers—particularly SMEs—in building capacity to manage modern slavery risks and fostering ongoing dialogue with suppliers to promote ethical labour standards across the supply chain. This includes the introduction of the Our Supplier page on the RetireAustralia website and direct emails explaining the Modern Slavery Act and how it relates to all parties.

As part of our commitment to continuous improvement, we will regularly review our risk assessment processes and refine our mitigation strategies to ensure our operations and supply chain remain resilient against modern slavery.

## Supplier case study: managing risk in the security sector

The security services industry is widely recognised as high risk for modern slavery due to its reliance on low-paid and casual labour, frequent use of subcontracting, and the employment of vulnerable worker groups. This makes it a key focus area for RetireAustralia's FY25 supplier due diligence efforts. The following case study highlights how one of our long-standing security providers is actively working to address these risks.

G Tec Security (**G Tec**) is a regionally based provider located in Wagga Wagga, New South Wales, that has supplied security services to RetireAustralia since 2014. With a workforce of approximately 40 casual and part-time staff, G Tec delivers services such as nightly patrols, alarm response, and static guarding at Riverina Gums Retirement Village located in Wagga Wagga in regional NSW.

The security sector is recognised as high-risk for modern slavery due to factors such as insecure employment, underpayment, subcontracting, the employment of migrant workers, excessive working hours, and limited access to grievance mechanisms. While G Tec operates entirely within Australia and does not use subcontracted labour, RetireAustralia identified the supplier for deeper review due to the industry's risk profile.

In response, G Tec has adopted a more proactive approach. The company introduced a formal Modern Slavery Policy in 2022, which is now incorporated into employee induction. Modern slavery awareness is embedded into the organisational culture, with key messages regularly reinforced through toolbox sessions and operational discussions to ensure it remains a visible and integrated part of day-to-day practices and decision-making. All staff are employed under the MA0016 Security Award, and right-to-work checks are conducted every six months. G Tec's rostering system is integrated with these checks to prevent non-compliant shift allocation.

The company also enforces break periods between shifts that exceed legal requirements—12 hours minimum, or 15 hours when travel is involved. Workers are required to declare any secondary employment in order to manage fatigue across roles. G Tec supports transparency by offering a confidential internal reporting process and by submitting to external payroll audits to ensure full wage compliance.

Importantly, G Tec does not use subcontractors or labour hire agencies. Where third-party suppliers are engaged—for example, for uniforms or vehicles—the company partners with large, reputable organisations such as Toyota, as well as Australian-based providers including Hunters Uniforms, MYOB, and Guardhouse software solutions.

RetireAustralia supports G Tec by offering shorter payment terms that ease financial pressure and help maintain fair labour conditions. While no modern slavery incidents have been identified, the case study highlights the effectiveness of practical, preventative measures taken by small regional suppliers. G Tec's approach demonstrates how strong leadership, worker protections, and operational transparency can significantly reduce the risk of modern slavery—even in sectors considered high-risk.

# 7

# ACTIONS TAKEN & EFFECTIVENESS



# Actions taken and effectiveness

RetireAustralia is committed to minimising the risk of modern slavery within our operations and supply chains, recognising the important role we play in fostering ethical and responsible business practices in the industries we work with. We are working to ensure this commitment is embedded in our governance framework and reflected in our approach to supplier engagement. We prioritise working with suppliers who align with the principles of the Modern Slavery Act and uphold high standards of ethical conduct.

Our strategy is grounded in risk-based due diligence that is proportionate, practical, and integrated into our business-as-usual operations. We aim to lead by example, use our influence to drive positive change, and act with integrity, transparency, and accountability.

To support this, RetireAustralia has implemented a range of ongoing actions including:

- External review and refinement of our Modern Slavery Statement and related governance practices.
- Supplier mapping to assess high-risk sectors, geographies, and product categories, and to enhance visibility of supply chains.
- Enhancement of procurement processes, including a review of the Procurement Framework, a strengthened new supplier onboarding process, and updates to our supplier Code of Conduct.
- Centralised supplier compliance via a third-party platform (**ComplyFlow**) to streamline onboarding and ensure consistent expectations regarding modern slavery and workforce obligations.
- Ongoing collection of workforce data, such as verifying supplier employee rights to work in Australia.
- Partnership building through contractual KPIs, supplier engagement, and early payment terms to support supplier sustainability and reduce financial pressure—particularly for high-risk suppliers such as builders and trades.
- Integration of ESG metrics into supplier performance evaluations to reinforce shared responsibility for ethical sourcing.

These measures form part of our continuous improvement program and reflect our broader commitment to embedding sustainable, ethical, and human rights-focused practices across our operations.

In addition to our ongoing commitments, RetireAustralia has completed several targeted initiatives and introduced a range of new continuous improvement actions. These are set out below.



Category	Description	Outcome/effectiveness	Status
Supplier selection, engagement & management	Conduct a procurement process to identify and formally engage with a suitable food supplier for the provision of ingredients to the 19 villages who provide meals to residents.	Agreement awarded to single national provider of food products, which greatly reduces efforts to ensure ethical sourcing of food manufacturing and supplies.	Complete
	Audit one preferred supplier from a high-risk category each year and develop case study for lessons learnt.	Enables in-depth assessment of supplier practices and identification of any modern slavery red flags; case studies support knowledge sharing and continuous improvement.	Complete and ongoing
	Continued consolidation of supply chain with a focus on controlling and formalizing (via process or contracts) low value engagements.	Reduces risk by improving oversight, particularly where previously informal arrangements may have lacked scrutiny on labour practices.	Ongoing
	Focus on engaging with and gaining a deeper understanding of the systems to identify and control modern slavery risks in suppliers who fall into the high-risk categories/engage a third party to assist with supplier mapping and analysis (e.g. Fair Supply platform, Walk Free and Responsible Sourcing Tool).	Third-party tools provide enhanced risk insight and enable data-driven supplier prioritisation for monitoring and remediation actions.	Complete
	Include ESG in the <u>weighted</u> criteria of tender evaluation plans across all areas of the business.	Ensures modern slavery and broader social responsibility are factored into supplier selection decisions, supporting more ethical procurement outcomes.	Complete
Training & education	Train, educate and share resources with local and SME suppliers, i.e. industry fact sheets to help them to understand RetireAustralia's reporting obligations and the part they play.	Builds supplier capability and encourages compliance with ethical standards, helps smaller suppliers understand and meet modern slavery requirements.	Complete and ongoing
	Refresher training to be conducted for all executive leadership team members	Reinforces leadership accountability for governance and ethical sourcing, ensuring senior decision-makers are aligned with modern slavery objectives.	Complete

Category	Description	Outcome/effectiveness	Status
	Develop and implement mandatory annual training that is tailored for all staff who procure goods and services as part of their roles.	Directly strengthens internal controls by ensuring those responsible for procurement are trained to identify and respond to modern slavery risks.	Complete and ongoing
	Extending awareness training across the business with the objectives being to define modern slavery, where it might occur and how to identify instances of it in our operations and supply chains, as well as related processes for how to escalate potential or actual modern slavery issues to the relevant people within RetireAustralia.	Promotes a culture of vigilance and early detection by empowering all staff to recognise and respond to risk.	Complete and ongoing
Reporting	Tailor requests for information from suppliers to suit their (risk) profile and remove blanket approach.	Increases efficiency and relevance of risk data collected, supports more meaningful supplier engagement while reducing compliance fatigue among low-risk suppliers.	Complete
	Varied all Precedent Agreements across the business to include Modern Slavery clauses and reference to the <i>Modern Slavery Act 2018 (Cth)</i> .	Communicates RetireAustralia's commitment to the Modern Slavery Act and outlines our expectations for suppliers to uphold the same standards.	Complete
Process improvements	Website upgrade to include a procurement page with information for suppliers including a copy of all relevant policies, the Code of Conduct and grievance procedure.	Improves transparency and accessibility of RetireAustralia's ethical expectations, supporting supplier education and encouraging responsible behaviour.	Complete

RetireAustralia remains committed to strengthening our response to modern slavery through continuous improvement, meaningful supplier engagement, and transparent governance. While our risk to date has been assessed as low, we acknowledge that vigilance is essential. Our actions reflect a proactive approach to compliance, education, and ethical procurement, and we will continue to embed modern slavery awareness and mitigation into our business practices. As our operations evolve and our supply chains grow, we will adapt our approach to ensure we uphold our values and meet our obligations under the Modern Slavery Act.



8

# LOOKING AHEAD



# Looking ahead

Looking ahead, RetireAustralia will continue to strengthen its approach to managing modern slavery risks by embedding ethical and human rights considerations more deeply into our procurement practices, governance structures, and workforce engagement. Many of the initiatives outlined below were first identified in our previous Modern Slavery Statement and, while progress has been made, they remain ongoing and form part of our broader three-year Continuous Improvement Plan. In addition, several new actions have been introduced in response to emerging risks and opportunities identified through our internal reviews and stakeholder engagement. Collectively, these planned actions reflect our commitment to continuously evolving our practices and ensuring modern slavery risks are proactively identified, managed, and mitigated.

## Supplier selection, engagement and management

- Develop a procurement strategy for facilities management suppliers in South Australia to support a more centralised approach.
- Establish a preferred supplier panel to deliver third-party services to home care clients.
- Continue formalising procurement arrangements with IT hardware providers, incorporating ethical sourcing and supply chain risk into evaluation processes.
- Review recruitment and labour hire practices to ensure compliance with Fair Work legislation and promote responsible labour practices.
- Introduce modern slavery-related KPIs into supplier contracts to improve accountability.
- Align information requests with what suppliers are already providing to other clients, helping reduce the reporting burden while maintaining visibility.
- Launch a contractor management program for high-risk supplier categories including IT, recruitment, catering, and facilities management.

## Training and awareness

- Evaluate the benefits of joining the Australian Supply Chain Sustainability School to enhance internal capability through access to education and tools.
- Collaborate with major facilities management suppliers to host joint awareness sessions with their subcontractors.
- Provide regular training for internal teams and external stakeholders on the Whistleblower Policy and how to raise concerns.
- Install modern slavery awareness signage in key work areas to ensure visibility across all parts of the workforce, including non-desk-based employees.

## Governance and reporting

- Review the scope of the Audit Committee to consider inclusion of and oversight of modern slavery and broader ESG responsibilities.

- Deliver annual updates on the Modern Slavery Action Plan to governance committees such as audit and risk.
- Standardise supply chain data collection and reporting across all departments to support consistent monitoring.

## Policy development and oversight

- Appoint members of the executive leadership team to oversee ESG and modern slavery compliance at the enterprise level.
- Develop additional human rights governance policies, including:
  - Human Rights and Anti-Slavery Policy
  - Anti-Bribery Policy
  - Conflict of Interest Policy and Procedure
- Establish a process to identify, screen, and manage volunteers to safeguard their welfare and mitigate any risks of modern slavery within our volunteer workforce.
- Review and relaunch the Gifts and Benefits Policy with a focus on probity, anti-corruption, and human rights.
- Align key policies, such as the Whistleblower Policy and Code of Conduct, with international principles like the *UN Guiding Principles on Business and Human Rights*.
- Develop internal auditing and performance metrics to monitor effectiveness and adherence to these policies.

## Process and technology improvements

- Refine internal purchase codes to better track spending in high-risk categories and enhance reporting capability.
- Investigate new technologies, including AI tools, to improve the identification and assessment of modern slavery risks in complex supply chains.
- Develop an Information Security Management System (ISMS) in alignment with ISO 27001 standards to enhance RetireAustralia's ability to securely manage sensitive supplier and employee data.



This statement is made on behalf of RetireAustralia as the reporting entity pursuant to the *Modern Slavery Act 2018 (Cth)* in respect of RetireAustralia and all entities owned or controlled by RetireAustralia (**RetireAustralia Group**) for the year 1 April 2024 to 31 March 2025.

This statement is endorsed on behalf of the Directors of RetireAustralia and RA (Holdings) 2014 Pty Limited on 17 September 2025.

A handwritten signature in black ink, appearing to read 'Brett Robinson', written in a cursive style.

**Dr Brett Robinson**  
**Chief Executive Officer**

On behalf of the Directors of RetireAustralia

## Appendix A: Supplier Questionnaire Summary – Modern Slavery Risk Assessment (FY25)

Supplier	Industry	Has modern slavery policy	Provides staff training	Reporting mechanism in place	Perceived industry risk	Supply chain oversight	Plans for improvement
Bidfood Australia	Food & catering supplies	Yes	Yes	Yes	Yes	Yes	Ongoing due diligence roadmap
Charter.pac Refurbishments	Construction	No (planned)	No (planned)	No (planned)	Yes	Limited	Policy and training in development
Croudace Constructs	Construction	No	No	No	Yes	Some due diligence	No current plan due to size
EWB Food Services	Food & catering supplies	Yes	Yes	Yes	Low	Indirect through HACCP	Monitor third-party compliance
Aidacare/FHG Furniture	Furniture manufacturer and retailers	Yes	Yes	Yes	Yes	Moderate (on-site checks)	Focus on tier 2–3 supply chain risks
Lifecare Furniture	Furniture manufacturer and retailers	Yes	Yes	Yes	Possible	Factory audits	Updating Code of Conduct
SAHCP (SA Homecare Therapies)	Allied health professionals	No	No	Yes (via surveys & meetings)	Low	N/A	No policy planned (low internal risk)

Supplier	Industry	Has modern slavery policy	Provides staff training	Reporting mechanism in place	Perceived industry risk	Supply chain oversight	Plans for improvement
Workspace Commercial Furniture	Furniture manufacturer and retailers	Yes	Yes	Yes	No	Limited	Industry communication planned
Descope Pty Ltd	Construction	In development	Planned	Planned	Yes	Yes (early stage)	Building policy & training framework
SG Fleet Australia	Motor vehicle lease	Yes	Yes	Yes	Yes (upstream risk)	Annual surveys, supplier CoC	Continuous improvement in supplier surveys
Taylor Building & Renovation	Construction	Yes	Yes	Yes	Yes	Strong subcontractor checks	Policy and training reviewed regularly

Legend:

- **Yes/no/planned** = Self-reported status from questionnaires.
- **Perceived industry risk** = Supplier's own assessment of modern slavery risk in their industry.
- **Supply chain oversight** = Level of monitoring, due diligence, or certification of suppliers.
- **Plans for improvement** = Future steps suppliers identified for strengthening practices.