

# Modern Slavery Statement 2025



## Introduction

### Bolton Clarke is Australia's largest independent not- for-profit aged care provider.

Our vocation to care is demonstrated in our support, services and welcoming home environments that enable people to age 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 ("**Bolton Clarke**") on behalf of the reporting entities in the Bolton Clarke Group being Bolton Clarke and its wholly owned entity, Royal District Nursing Service Limited. This Statement is also submitted on behalf of RDNS Homecare Limited, which is reported on a voluntary basis. The reporting entities are governed by a 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 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 and present 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 2025 Modern Slavery Statement, which reflects our continued commitment to protecting human rights and addressing the risks of modern slavery across our operations and supply chain.

The Global Slavery Index 2023 estimates that 50 million people are living in modern slavery worldwide. These figures call to attention that exploitation is a prevalent issue. As Australia's largest independent not-for-profit aged care provider, Bolton Clarke recognises our responsibility to act with vigilance and compassion.

Our purpose - Helping people live a life of fulfilment - guides everything we do. It is underpinned by our values: Be Kind, Be Curious, Listen, Always Safe and Always Together. These values shape our approach to care and extend to how we engage with our suppliers, employees, and communities in identifying and addressing modern slavery risks.

In FY2024/25, we took important steps to embed sustainability and human rights considerations into our procurement processes and due diligence protocols. We prioritised direct engagement with suppliers, fostering open conversations about ethical sourcing and shared responsibility. These approaches are helping us build stronger, more transparent relationships and ensure our values are reflected throughout our supply chain.

Looking ahead, we remain focused on deepening our understanding of modern slavery risks, enhancing our risk mapping tools, and expanding education and training across our workforce and industry partners.

We know that meaningful change requires ongoing effort, and we are committed to continuous improvement.



Olivier Chretien

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 140 years.

## Our organisation today

Our 16,500+ employees make more than 11,500 daily home and community support visits and care for residents in 88 residential care homes and 43 retirement living communities.



# Our service locations

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

## Our service locations



## 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
- Support at Home
- 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

- 43 villages across QLD, NSW, VIC, SA and WA
- Design, develop, commission and operate villages
- Some 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 Strategic Direction. 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.

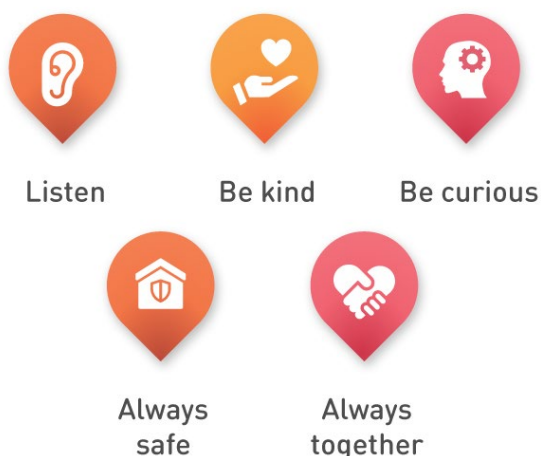
## Our purpose and values

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 Listen, Be Kind, Be Curious, Always Safe and Always Together 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 FY2024/25, we advanced our sustainability strategy through five strategic themes—customer at heart; inclusion, wellbeing & belonging; connected communities; environmental resilience; and governance and sustainable supply chains. This integrated approach has strengthened our capacity to identify and address modern slavery and human rights risks across our organisation and supply chain. Through stakeholder engagement and enhanced governance and procurement processes, we are building a more ethical, transparent, and resilient organisation committed to protecting vulnerable individuals and promoting dignity and fairness in all aspects of our work.

As part of this progress, we have embedded sustainability into our procurement practices, reinforcing our commitment to responsible sourcing and deepening supplier relationships. Sustainability is now a formal component of our tender templates and due diligence processes, influencing the development of tender scopes and supplier evaluations. Our supplier engagement has expanded beyond modern slavery to encompass broader sustainability themes, and we are enhancing our supply chain risk mapping to include detailed assessments of sustainability performance. A desktop review of our top 50 suppliers is underway, evaluating their sustainability reports and social impact initiatives to ensure alignment with our values and expectations.

## 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 in Australia.

83% of our expenditure is with 100 suppliers.

94% of our expenditure is across the following 7 major spend categories:

Food, catering and hospitality	22%
ICT software, networking and support services	18%
Property and facility maintenance services	16%
Labour hire/ agency staffing	12%
Aged care and homecare support services*	11%
Medical equipment, consumables and supplies	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

The main impacts on the supply chain and operations in FY2024/25 were:

- Workforce availability; and
- Environmental events.

### Workforce availability:

The labour market in Australia is heavily regulated, with specific emphasis on regulation in aged care sectors. The difficulty in hiring employees continued throughout FY2024/25 – 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 Responsible 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. Similar provisions are inserted in agency contracts that are not on Bolton Clarke's standard agency engagement terms and conditions.

As noted in the FY2023/24 report, Bolton Clarke is a Pacific Australia Labour Mobility (PALM) scheme approved employer, allowing us to engage with employees from the Pacific Islands to supplement workforce gaps in some of our more remote or regional locations. The case study below provides more information relating to our PALM support program.

### Environmental events:

Bolton Clarke operates across a wide geographical footprint, which means our communities are often exposed to environmental events such as cyclones, bushfires and flooding. These emergencies can create significant operational challenges, including disruptions to supply chains and increased demand on our workforce.

An example of this occurred during the 2025 ex-tropical cyclone Alfred, when 29 of our communities had a short window to prepare for potential impact. During this period, many team members worked extended hours to ensure the safety and wellbeing of our customers. Importantly, Bolton Clarke ensured that any additional hours were strictly voluntary and that no team member was pressured to work beyond their standard shifts. All employment obligations were fully upheld in accordance with our Enterprise Agreements.

This approach reflects our commitment to ethical employment practices and reinforces our zero-tolerance stance on any form of coercion, exploitation or modern slavery. It also demonstrates our organisational values of respect, choice, and wellbeing, even in times of operational stress.

## 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 FY2024/25.

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 considered allied health or labour hire including home modifications, domestic assistance and social support, visiting entertainers, transportation etc.*

During FY2024/25, the Procurement Team reviewed action plans developed by suppliers who completed questionnaires in the previous reporting period. This included waste management 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 suppliers taking a proactive approach to addressing modern slavery risk in their supply chains.

During the FY 2024/25 reporting year, formal sourcing events were undertaken across five categories of direct and indirect spend. Questions relating to modern slavery management were included in all of the sourcing documents. 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 were considered in the overall selection outcomes.

## Case Study: Continued focus on worker wellbeing through the PALM Scheme

In FY2024/25, Bolton Clarke continued to uphold strong ethical practices in the administration of the Pacific Australia Labour Mobility (PALM) scheme, ensuring that all activities aligned with human rights standards and did not contribute to modern slavery risks. This government-led initiative enables ethical recruitment of employees from Pacific nations, including Fiji, Kiribati, and the Solomon Islands, while ensuring fair treatment, wellbeing, and community integration.

This year, Bolton Clarke recruited and placed 74 PALM employees, all holding Certificate III qualifications in Individual Support (Ageing). These employees are employed under contracts aligned with Fair Work and Enterprise Agreement (EA) standards, ensuring equal pay, conditions, and entitlements as Australian employees. The PALM-specific contracts also include additional information about rights and protections, reinforcing transparency and compliance.

To support employee wellbeing, Bolton Clarke has implemented a comprehensive support framework:

- **Community Integration:** New team members are connected with local churches, community groups, and recreational centres to foster belonging and reduce isolation.
- **Dedicated Support Roles:** PALM Support Officers (PSOs) serve as direct contacts for employees across regions, providing guidance on health, wellbeing, and workplace matters.
- **Buddy Program:** Over 100 employees have been trained as ‘buddies’ across 20 sites to ensure work integration and best practices are transferred to new employees.

- **Regular Engagement:** Fortnightly catchups between PALM employees, PSOs and site General Managers ensure ongoing dialogue, enabling employees to voice concerns and seek assistance.

All PALM employees undergo the same induction and training as local employees, with additional briefings from Fair Work and union representatives. Cultural competency training is mandatory for all personnel working with PALM participants, helping to prevent discrimination and promote inclusion.

Health and safety are prioritised through visa-compliant health insurance coverage and onboarding guidance on accessing medical services. Accommodation provided to employees meets PALM DEWR (Dept of Employment and Workplace Relations) standards and is formally approved prior to mobilisation.

Bolton Clarke also maintains strong relationships with Labour Sending Units and government officials in the employees' home countries, ensuring transparency and mutual accountability. Internal audits are conducted to verify working hours and conditions, and any redeployment of employees is managed in accordance with PALM DEWR protocols.

The success of this collaborative and ethical approach is reflected in a 98% retention rate, with many employees completing the full four-year term and expressing interest in returning after their mandatory offshore period.

## Our Approach to identifying modern slavery risks and monitoring the supply chain

Our management framework is built around a continuous cycle of engagement, assessment, and improvement. Through ongoing dialogue with stakeholders and regular reviews of our practices, we aim to deepen our understanding of potential risks and strengthen our capacity to respond effectively. The diagram below outlines our approach to identifying modern slavery risks and monitoring our supply chain.



The Procurement team submits a quarterly supply chain report to the Board Risk and Audit Committee, with a targeted focus on actions undertaken to assess the supply chain for emerging and anticipated risks that may affect supply continuity and costs, or organisational reputation. This report also includes the identification and analysis of any modern slavery risks that may have impacted the sector, specific procurement categories, or associated suppliers over the preceding quarter. Where such risks have been identified, the report outlines the investigative steps taken and the mitigation strategies implemented to address them.

## Monitoring the supply chain for modern slavery risk

During the reporting period, the Bolton Clarke Procurement Team continued to actively monitor domestic and international news and journals for instances of modern slavery that may impact our supply chain—either through direct suppliers or their subcontractors. In addition to this ongoing vigilance, we initiated a targeted review of our top 50 suppliers, segmenting them and conducting desktop research to assess their approaches to sustainability and modern slavery risk management.

This research provides a foundation for meaningful engagement with each supplier, enabling us to open dialogue around their policies, practices, and opportunities for improvement. We have already commenced this process with our uniform supplier, engaging in constructive conversations on areas of mutual interest and concern. This proactive approach reflects our commitment to transparency, continuous improvement, and the protection of human rights throughout our supply chain

### Case Study: Media monitoring and supplier engagement – tomato products

As part of our modern slavery due diligence framework, we undertake regular media monitoring to identify potential risks of modern slavery and forced labour across our value chain. This proactive approach enables us to respond swiftly to emerging concerns and engage directly with suppliers to verify product origins and labour practices.

In December 2024, international media reports\* raised concerns regarding the potential use of forced labour in the harvesting of tomatoes used in Italian-labelled tomato puree products. In response, we launched a targeted review of our procurement practices related to tomato-based goods, with a particular focus on ‘preferred products’ used in site purchasing.

We promptly contacted our food suppliers to confirm the origin of the affected products, specifically investigating whether any ingredients could be traced to the region identified in the media reports. The supplier engaged with their upstream supply chain to review both current and future vegetable sourcing arrangements. In parallel, we conducted independent follow-up discussions with relevant suppliers to validate these findings.

All parties provided detailed assurances that none of the tomato products supplied to us originated from the region in question or were associated with forced labour practices. Suppliers also shared information on their labour standards and ethical sourcing frameworks, reinforcing their commitment to responsible business conduct. This case underscores the critical role of media scanning, supplier engagement, and supply chain traceability in identifying and mitigating modern slavery risks. \*(Source: (8 Dec 2024); [‘Italian’ purees likely to contain Chinese forced-labour tomatoes](#) (2 Dec 2024))

## 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
Responsible 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 employees, suppliers, contractors and their family to report or disclose any concerns they may have relating to reportable misconduct
Code of Conduct	Provides employees 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 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 employees 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 employees either directly or through third party agencies
Legislated entitlements	Ensure that all employees receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays. You must pay employees' 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 employees 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, Associated Provider 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 FY2024/25 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 reviewed our modern slavery training offering and developed an updated version for upload to our learning management system.
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 FY2025/26

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
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 – this 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 27 November 2025.



Tony Crawford  
Chairman

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