

# Modern Slavery Statement



Reporting period July 2024 to June 2025

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Contents including Mandatory Reporting criteria in the Modern Slavery Act 2018 (Cth)

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# 1. Introduction and Commitment

This 2025 Modern Slavery Statement (“Statement”) is the second Statement submitted by ECH Inc (ECH) to fulfil the requirements of the Commonwealth Modern Slavery Act 2018 (the “Act”).

The purpose of this Statement is to outline ECH’s approach to ensuring the organisation has a framework and processes in place to minimise the human rights risk of modern slavery in our daily operations and supply chains.

ECH recognises that modern versions of slavery can occur in many forms and that everyone plays a part in the elimination of modern slavery, this includes: slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

ECH rejects any form of modern slavery and is committed to implementing effective systems and controls to prevent modern slavery occurring within the business or supply chains. ECH respects the human rights of its clients, residents, employees, suppliers and business partners and aims to identify and manage any risks to these rights.





## 2. Identifying the reporting entity

### 2.1 Reporting entity

The reporting entity is ECH Incorporated, (ABN 32 930 142 652) (ECH), a charitable association incorporated under the Associations Incorporations Act 1985 (SA). ECH does not own or control any other entity. ECH is also a Public Benevolent Institution (PBI) and is registered with the Australian Charities and Not-for-profits Commission (ACNC).

### 2.2 Our history

Since 1964 ECH has been enabling clients to 'Get MORE out of Life' as they age. ECH is one of South Australia's largest profit-for-purpose providers of retirement living accommodation, as well as services that promote self-determination and enable people to have the best life possible as they age.

ECH has a community focus and offers clients a range of services with one of the largest offerings of At Home Services in South Australia, enabling our clients to live life well at home. Through our services, we enable older people to stay involved with their community and engage in activities which they value, and therefore enhance their independence. More information can be found at [www.ech.asn.au](http://www.ech.asn.au).

ECH also offers independent retirement living accommodation across metropolitan Adelaide, Adelaide Hills, Victor Harbor and Ardrossan. Our ECH retirement villages offer purpose-built communities, so residents are surrounded with other like-minded people and can enjoy the security and friendship this brings.

### 2.3 Our purpose

Is to provide clients, residents, carers and their family with quality accommodation, support and services to remain independent as they transition through different stages of life. At ECH we collaborate and innovate, building better lives and inclusive communities to ensure people get MORE out of life.

### 2.4 What we provide

ECH services cover:

- Retirement Living
- At Home Services
- Allied Health Services
- Clinical and Nursing Services
- Wellness & Fitness Services
- Community Engagement
- Day Respite and Social Programs
- Care Management



### 3. Describe the structure, operations and supply chains

#### 3.1 Organisational structure

ECH has a Board of Directors made up of experienced professionals from a wide range of business and community sectors. The Board is responsible for setting overall strategic direction and policies in line with its constitution and for ensuring ECH complies with all regulatory requirements, including the Aged Care Act, Retirement Villages Act and the Residential Tenancies Act.

The Board's direction is implemented by an extensive team of qualified and experienced ECH staff, including a Chief Executive and Executive Team. All ECH staff are committed to providing high quality and individually tailored services to clients to ensure they have a voice in their service planning and the delivery of services.

#### 3.2 Operational structure

ECH's head office is located at 174 Greenhill Road, Parkside with a Property Management and Independent Living office at Kidman Park. ECH owns and operates more than 1,900 Independent Living Units (ILUs) across 109 retirement villages, which offer purpose-built communities. There is one assisted living site in Henley Beach. ECH also has four Wellness centres, four Social Programs and a large team who provide in-home services. Services are provided by a team of over 800 staff, with a wide range of skills. These include home support staff, administrators, information and communications technology (ICT), marketing, finance, human resources professionals and a number of volunteers.



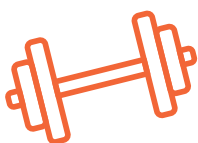
1,900 Independent Living Units



109 Retirement Villages



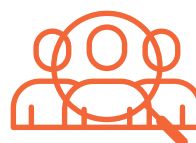
1 Assisted Living site in Henley Beach



4 Wellness centres



4 Social Programs



Large team who provide in-home services



Team of over 800 staff



### 3.3 Supply chains

ECH engages a vast range of suppliers and agency staff, including sole traders, small to medium enterprises and larger, national companies. Our suppliers work in various industries including construction and maintenance, gardening, clinical and allied health, utilities, waste management, telecommunications and various suppliers of administration and professional support including legal services, marketing, information technology and advisors for the investment portfolio.

The majority of the goods and services that ECH procures are sourced from suppliers and contractors based in Australia.

### 3.4 Investment portfolio

ECH's investment portfolio, which is managed on our behalf by an external investment manager, follows ethical guidelines relating to investment opportunities.







## 4. Describe the risks of Modern Slavery practices in operations and supply chains

### 4.1 Operations

ECH recognises that as an employer of greater than 800 people, it may cause, contribute, or be directly linked to modern slavery risks.

Some of our workforce is drawn from vulnerable populations with a high number of migrant workers and lower-skilled workers employed across aspects of facilities management and home services delivery (such as facilities and garden maintenance, home support and domestic assistance). ECH also conducts operational functions that include repeatable administrative and clerical services.

### 4.2 Supply chains

ECH recognises that our supply chain is linked to high-risk industries, such as the procurement of mass-produced goods, IT equipment including computers and mobile phones and medical

supplies including latex gloves. We are aware that suppliers of these products and services may also have modern slavery risks within their supply chains, especially when they are being manufactured in countries that are considered to be 'high' risk by The Global Slavery Index.

Examination of our supply chain is guided by the Australian Government's Guidance for Reporting Entities ("Guidance Report") to determine risks against three categories, being risks that may possibly cause, contribute and/or be directly linked to modern slavery practices in the sector, industry, product and service types, and geographic locations.





## 5. Describe the actions taken to assess and address modern slavery risks including how the effectiveness of the actions are assessed

ECH is committed to the highest standards of client care and service to the community. We're pleased to report that ECH already has existing policies, practices and supplier/agency agreements in place to proactively address and reduce the risks of modern slavery in our operations and supply chains. ECH has engaged a number of external parties to support with advice and risk mitigation strategies.

### 5.1 Operations

ECH has assessed the risk of modern slavery in our workforce to be low, due to strict regulations and legislation in the health services sector, commitment to employment laws that we are required to comply with and a strong focus on managing the health safety and wellbeing of our employees including maintaining a diverse workforce and inclusive and safe workplace. ECH embraces a holistic human rights approach across the organisation.

Our internal framework includes:

- People & Culture Policies and Procedures that support operational recruitment and ongoing employment practices.
- Mandatory employment screening practices and verification of right to work in Australia for all employees.
- All employees and temporary staff are required to have a valid Criminal History check.
- Industrial regulations (awards, agreements, employment contracts) that govern employment relationships.

ECH has not yet identified any specific instances of modern slavery harm in our operations and is committed to ensuring that all our employees

have access to the resources and supports necessary to report modern slavery practices should they arise. ECH has implemented a new Human Capital management system, Dayforce, to support with improved visibility of screening and compliance obligations and consistent recruitment practices. As ECH operate within the aged care industry which is a highly regulated sector we have high levels of reporting and disclosure obligations. ECH is required to undertake an annual review of all key personnel, and has implemented a risk rating review of all Policies & Procedures which outlines the review cycle for the different documents.

### 5.2 Staff training

All ECH staff undertake an annual modern slavery training package. The training introduces staff to modern slavery and its legal framework including how to identify potential signs of modern slavery and how and where to report any concerns.

The ECH Board and Executive has also received dedicated modern slavery training that included:

- A general awareness of modern slavery;
- An overview on risks specific to ECH;
- A summary of the Modern Slavery Act and overview of global human rights frameworks
- Importance of engaging modern slavery prevention practices; and
- Considering recommendations for future action and overview of guiding principles for modern slavery due diligence.

### 5.3 Supply chains

ECH has put in place robust due diligence and controls for risk to ensure that any supplier or agent we work with is aligned with our ethics, values and principles. Assessing modern



slavery risks in our supply chains is a continual undertaking which ECH seek to improve upon in each reporting period in responses to any changes in risk.

Recognising that some of our suppliers operate in countries where modern slavery risks are high, all suppliers are onboarded and screened through a third-party contractor management system called Rapid Global. In addition to initial onboarding, Rapid Global manages our supplier inductions and lifecycle compliance documentation. All suppliers and agents are required to read and acknowledge ECH's Supplier Terms and Conditions Agreement prior to providing goods and/or service to ECH.

These terms and conditions require our suppliers and their subcontractors, (and to the extent practicable, its other suppliers and business partners) to comply with all laws, including the Act by taking reasonable steps to identify, assess and address risks of Modern Slavery practices in its operations and supply chains.

ECH employs a contractor performance management framework which is tailored to the risk profile of its contractors. The risk profile is determined using monthly spend and/or monthly

purchase order volume. By virtue of these criteria, contractors who are conducting high value/high volume works translate to a higher risk profile. ECH meets frequently with these contractors and modern slavery requirements are a standard agenda item.

#### 5.4 ECH internal compliance

The Manager Procurement & Fleet (Compliance Manager) has primary and day-to-day responsibility for implementing ECH's Modern Slavery Policy and monitoring its use and effectiveness and dealing with any queries about it.

The Compliance Manager's responsibilities extend to:

- monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in our operations;
- monitoring and consulting with our suppliers, contractors and business partners to identify risks of modern slavery practices in our supply chains;
- developing measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations;



- monitoring the effectiveness of those measures; and
- developing appropriate training materials and programs for our employees to comply with this policy.

5.5 Risk Assessment Process and Findings

ECH uses a cloud-based platform called Fair Supply to map its supply chain and associated understanding of its modern slavery risk. With over 1,000 contractors, ECH’s top 5 modern slavery risks can be segmented as general business services, hotel and restaurant services, construction work, health and social work services and textiles.

The platform assesses contractor risk across 5 categories from low to moderate-low, moderate to moderate-high, and high.

Fair Supply’s 2023 – 2024 analysis of ECH’s supply chain identified 670 suppliers as low, 417 suppliers as moderate-low and 12 suppliers as moderate. No suppliers were identified as moderate-high or high.

Fair Supply’s 2024 – 2025 analysis of ECH’s supply chain identified an additional 2 suppliers as Moderate, taking the total in our Supply Chain to 14. Once again, no suppliers were identified as moderate-high or high.

For the 14 suppliers identified as moderate (the highest risk among our existing suppliers), we issued a Modern Slavery Self-Assessment Questionnaire in May 2025 (SAQ), in order to gain insight into their existing policies, procedures, and due diligence processes. The primary goal of the SAQ was to evaluate the maturity of each supplier’s mitigation framework, which is quantified as a ‘Risk Mitigation Score’. From the 14 suppliers contacted, we received 5 completed questionnaires, representing a response rate of 36%, despite two rounds of email follow-ups issued by Fair Supply. All 5 responses had a total score below 15%, with an average of 7%, which represents a Basic risk mitigation response.

A ‘Basic’ Risk Mitigation Score suggests that while foundational risk management elements may be in place, that there are clear opportunities for development. The response rate also underscores the need for continued engagement with the nine non-responsive suppliers. On the other hand, despite being suppliers with the highest inherent risk of modern slavery in their supply chains, these 14 suppliers represent a small fraction of ECH’s supplier base, accounting for 0.20% of the total spend and 1.15% of the total risk.

Moderate Suppliers – Annual Spend	\$149,924
Moderate Suppliers – MS Footprint	0.0119 (estimated people in forced labour)
Moderate Suppliers – % of Spend	0.20%
Moderate Suppliers – % of MS Risk	1.15%
Total ECH Spend	\$75,183,252
Total ECH MS Footprint	1.0331 (estimated people in forced labour)

ECH’s use of Fair Supply has enabled a detailed understanding of modern slavery risks across its extensive contractor base. While the overall risk profile remains low, the identification of 14 moderate-risk suppliers highlights the importance of targeted engagement and continuous improvement. The low response rate and basic mitigation scores from the SAQ process underscore the need for stronger supplier collaboration and capacity-building. These suppliers represent a small portion of ECH’s total spend and risk footprint, yet their elevated inherent risk warrants ongoing attention. ECH remains committed to refining its ethical procurement practices and strengthening its modern slavery risk management framework through data-driven insights and proactive supplier engagement.

## 5.6 Reporting concerns

The ECH website offers the opportunity for staff, volunteers and members of the public to raise concerns regarding modern slavery at ECH. The website includes an enquiry form, a feedback/complaint form that can be completed anonymously, as well as details for a whistleblower hotline. These concerns will be managed in accordance with the respective feedback and whistle-blower policies. The forms have been updated in the reporting period to allow further ease of reporting for members of the public.

The Modern Slavery Policy outlines the expected process for staff to follow if they have concerns regarding modern slavery at ECH. This process was also outlined in the online training module which is mandatory for staff.

## 5.7 Future actions

We acknowledge that addressing modern slavery is an ongoing journey. Our approach will evolve through regular policy reviews, supplier engagement, staff training, and transparent reporting. We are committed to continual improvement and to fostering a culture of ethical practice across all areas of our business.

To build upon our existing supply chain onboarding and monitoring due diligence process, there are two potential avenues we may consider for future supplier engagement.

- One approach is to conduct targeted follow-ups with the 'Moderate' risk suppliers who did not respond to this initial campaign.
- Alternatively, a new outreach may be initiated, focusing on suppliers with a lower inherent risk profile, who, due to high spend, still account for a notable proportion of the overall modern slavery risk. This would broaden the scope of the assessment and provide a more comprehensive view of risk across the supply chain.

These potential next steps can complement the existing process of assessing new suppliers as they are onboarded, which remains a valuable practice, as those questionnaires are more likely to be completed, providing a crucial opportunity to assess new risks as they are introduced to ECH.

We are exploring the development of an Ethical Procurement Policy that will embed human rights considerations into our procurement processes. This policy will guide supplier selection, contract management, and ongoing engagement, ensuring that our procurement decisions reflect our values and responsibilities.

ECH are currently undertaking a procurement process to engage an external firm to support with a broad Internal Audit program, commencing in 2025-26. The firm will conduct a review of the Procurement & Contractor Management processes and internal controls to ensure compliance with internal policies and procedures, including alignment with Delegations of Authority. An assessment of Rapid Management will be undertaken and an evaluation of contractors and suppliers for suitability including the initial risk assessments and period monitoring of changes.

In 2024-25 ECH engaged PwC to support with the development of a Sustainability Strategy and 3-year roadmap for implementation. The development involved assessing and validating ECH's material sustainability topics which was undertaken in consultation with key stakeholders including our clients and residents. A key governance topic is in relation to transparency and accountability relating to ECH's commitment to openly communicate our decisions and actions, ensuring stakeholders have clear insight and understanding. This includes seeking, receiving and responding to feedback received from our stakeholders. As part of the implementation of our sustainability strategy ECH will be seeking to create a Sustainability Working Group who will support with continuous improvement activities as they relate to managing Modern Slavery risk and overall management of our Supply chain.





## 6. Declaration

This statement was approved by the ECH Inc Board on 30 October 2025 which is the principle governing body and duly signed by both the Chair of the Board and the Chief Executive on 30 October 2025.

Signed on behalf of ECH Inc by:

**Rosina Hislop**  
Board Chair

30 October 2025

**Mark Watson**  
Interim Chief Executive







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