



medibank

# Modern Slavery Statement 2023

It starts to race.

You run.

At the pace.

You climb stairs.

on your job.

you are

ing

muscle

a day

never

our

in a life time.

4 billion b

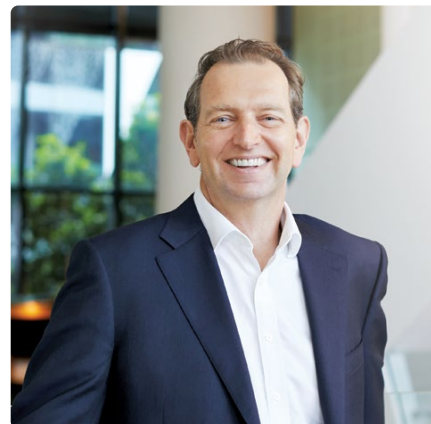
# Modern Slavery Statement 2023

I am pleased to present Medibank's 4th Modern Slavery Statement, which highlights what we are doing to help prevent modern slavery and human trafficking in our operations and across our supply chain and operational partners.

Walk Free's 2023 Global Slavery Index estimates that almost 50 million people worldwide are living in modern slavery. This includes Australia, where more than 41,000 people are estimated to be experiencing modern slavery in some form.

Medibank's 2030 Vision is to create the best health and wellbeing for Australia. As a supporter of the United Nations Sustainable Development Goals, we look to work with suppliers and operational partners that understand the role that companies can play – through either action or inaction – in modern slavery worldwide.

Since our first statement three years ago, we have continued to strengthen our governance and due diligence around modern slavery, and to raise awareness both within and beyond our business. I am proud of our progress this year and look forward to building on this in the years to come.



A handwritten signature in black ink, which reads "David Koczkar". The signature is fluid and cursive.

**David Koczkar**  
Medibank CEO

This is a joint modern slavery statement under section 14 of the Modern Slavery Act 2018 (Cth) (the Act) made in respect of each of Medibank Private Limited (ACN 080 890 259) and its wholly owned subsidiary Medibank Health Solutions Pty Limited (MHS) (ACN 078 934 791).

It is submitted by Medibank Private Limited on behalf of itself and MHS in respect of the period 1 July 2022 to 30 June 2023 (FY23).

For the purpose of this statement, the "Group" or "Medibank" refers to both reporting entities and those further entities which they own or control.

The Board of Directors of Medibank Private Limited has approved this statement on behalf of itself and the MHS reporting entity covered by the statement and has authorised it to be signed by CEO David Koczkar.

## Acknowledgement of Country

Medibank acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation. We proudly recognise Elders past and present as the Traditional Owners and Custodians of the lands on which we work and live. We're committed to supporting self-determination and envision a future where all Australians embrace Aboriginal and Torres Strait Islander histories, cultures and rights as a central part of our national identity. Aboriginal and/or Torres Strait Islander peoples should be aware that this report may contain the images and names of people who may have passed away since publication.

# Introduction

**This is our 4th annual modern slavery statement, published in accordance with the Modern Slavery Act 2018 (Cth). It details our key activities in FY23 to prevent modern slavery in our operations and across our supply chain and operational partners.**

This statement has been developed in consultation with the senior executives of the Group. We're committed to ensuring Medibank is a responsible and sustainable business and support the United Nations Sustainable Development Goals (SDGs) most relevant to the work we do.

Our work to prevent modern slavery in our business operations and supply chain aligns to SDG 5 (gender equality), SDG 8 (decent work and economic growth) and SDG 10 (reduced inequalities).



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# FY23 achievements



## Governance

Published and promoted our **Modern Slavery and Human Rights Risk Management Procedure**



Published new **External Partners' and Suppliers' Code of Conduct**

Commenced roll out of **human rights provisions** for existing and future third-party contracts

Embedded **additional modern slavery controls and obligations** in our enterprise risk management system for ongoing visibility and reporting

Developed a **third-party risk management strategy**

Updated our **Responsible Investment Policy** to consider modern slavery in our investment decisions



## Due diligence

Identified, investigated and resolved a modern slavery issue in our supply chain



Completed inherent risk assessment of the supply chain to **Integrated Care Services Pty Ltd and Amplar Home Health Pty Ltd**

Assessed inherent modern slavery risk in our **hospital agreement network**



## Education and awareness

Led the development and delivery of a modern slavery webinar for business



Trained **52** key employees directly involved in the engagement of suppliers and partners in **sustainable buying** (including modern slavery)

Raised awareness of **worker rights to sales agents** who sell health insurance to international students

Held discussions with approved employers of **Pacific Australia Labour Mobility scheme (PALM) workers** to highlight the importance of modern slavery contract provisions

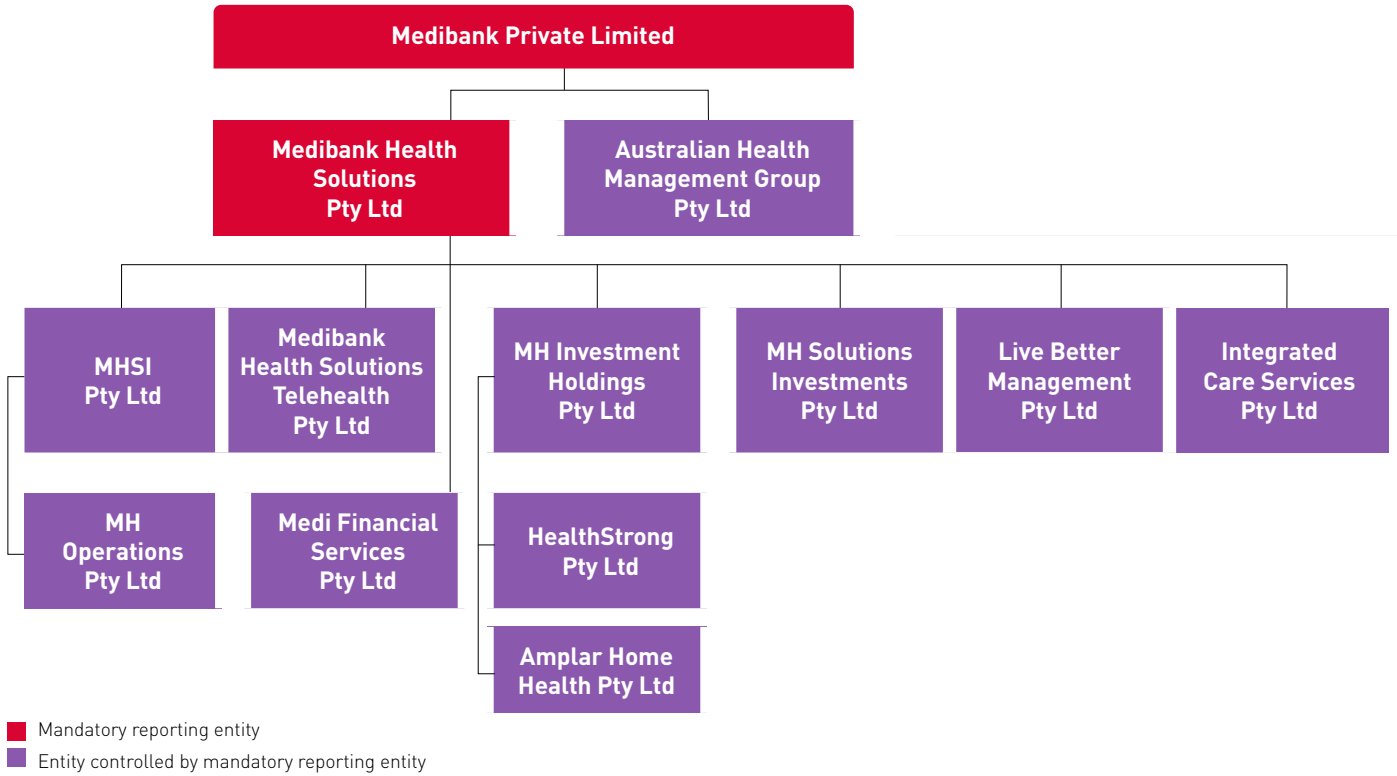
Raised internal awareness of modern slavery through **Group-wide monthly sustainability communications**

# About us

(Criterion 1 – Identify the reporting entities)

This statement is provided on behalf of Medibank Private Limited (MPL) and its wholly owned subsidiary Medibank Health Solutions Pty Limited (MHS), those entities which they own or control.

## Group structure



Note: This diagram only presents subsidiaries that are wholly owned or controlled. Our FY22 Modern Slavery Statement included Medibank Health Solutions Telehealth Pty Limited (MHST) (ACN 069 396 792) as a reporting entity. While MHST no longer meets the criteria for reporting in accordance with the Act, it is captured in the statement as a subsidiary entity of MHS.

## Our purpose, vision and values

Purpose	<b>Better Health for Better Lives</b>
Vision	<b>The best health and wellbeing for Australia</b>
Our strategy	<b>Growing as a health company</b>
Values	 <b>Customer obsessed</b>  <b>Show heart</b>  <b>Brilliance together</b>  <b>Break boundaries</b>

# Our operations, supply chain and operational partners

(Criterion 2 – Describe the structure, operations and supply chains of the reporting entities)

## Operations

The FY23 enabling functions\* of People, Culture & Sustainability, External Affairs, Risk, Legal, Governance & Compliance, Technology & Operations and Finance continue to be centralised and operate across all entities in the Group. Our operations adhere to Australia’s labour laws and our workforce management practices across our team of more than 3,600 people continue to have a low inherent risk of modern slavery.

100%



of our operations  
are based in Australia

For the purposes of this statement, operations refer to activities undertaken by the Group to pursue its business objectives.

Reporting entity	Overview
<b>Medibank Private Limited (MPL)</b>	The core business of Medibank Private Limited (MPL) is the underwriting and distribution of private health insurance. We offer hospital and extras policies to customers in Australia as well as health insurance to overseas visitors, students and workers. MPL also distributes diversified insurance products, including home, motor, travel, life and pet insurance products, on behalf of other insurers. These products and services are commonly provided under the Medibank and ahm brands.
<b>Medibank Health Solutions Pty Limited (MHS)</b>	MHS has a number of operations that deliver telehealth, allied health services, hospital in the home, chronic disease management and integrated care coordination. To deliver these services, we have a network of health practitioners that we directly employ or contract through agencies all of which are based in Australia. These services are commonly provided under the Amplar Health brand.

\* In July 2023 we announced organisational changes impacting business unit names and role titles. Given this statement relates to the FY23 period, the terminology within this document reflects the business unit names, role titles and other terminology that was in place at that time.

## Supply chain and operational partners

### Definitions within this report

Supply chain and operational partners support our operations. We have specified operational partners as separate to supply chain due to the different nature of their transaction.

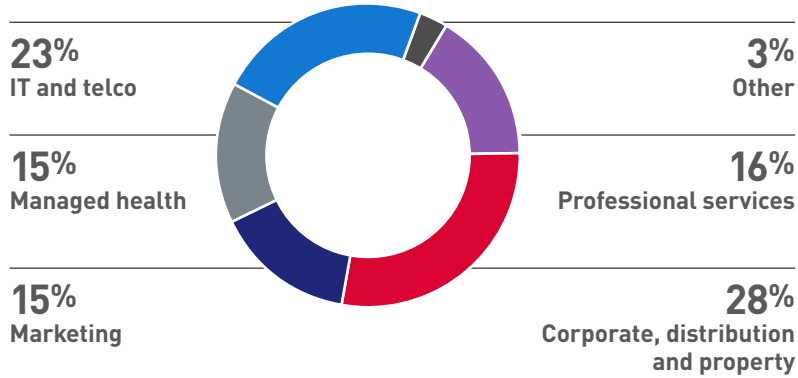
References	Supply chain	Operational partners
‘Tier 1’	<p>Companies that supply goods and services to Medibank whereby we have a direct relationship with the supplier e.g. IT and office equipment, health and medical supplies, and sales and marketing merchandise.</p> <p>We outsource services which are captured in supply chain.</p>	<p>Companies that supply goods and services to Medibank’s customers and clients.</p> <p>The operational partners covered in this report include:</p> <ul style="list-style-type: none"> <li>• External organisations who we have rebate and commission agreements with for the sale of Medibank and ahm health insurance products e.g. direct sales via aggregators and educational agents.</li> <li>• Private hospitals that we contract with via Hospital Purchaser Provider Agreements (hospital agreement network) to deliver services to Medibank and ahm customers through their health insurance policies. Hospitals are included in the inherent risk metrics of this statement but excluded in metrics elsewhere.</li> <li>• Allied health providers who deliver services to our customers and community through our Amplar Health offering e.g. Amplar Home Health.</li> </ul> <p><small>Note: We contract with allied health providers who deliver services to Medibank and ahm customers through their extras policies. Our customers can also access care at a non-contracted hospital, including both public and private hospitals. These providers are not included in this FY23 statement.</small></p>
‘Tier 2’	Suppliers who supply goods and/or services to our tier 1 suppliers.	Partners of, and suppliers to, our tier 1 operational partners.
‘Third parties’ and ‘third-party’	Tier 1 suppliers and operational partners.	

# Our operations, supply chain and operational partners

(Criterion 2 – Describe the structure, operations and supply chains of the reporting entities)

For the purpose of this statement, all references to supply chain and operational partners relates to tier 1 unless otherwise stated.

## Spend by category



## Geographic distribution (and country risk)



Modern slavery country risk	
High	Medium
Low	Very low

\* Suppliers from these countries represent <0.1% of spend per country

## FY23 key numbers

Our supply chain and in-scope operational partners

Around **2k** suppliers and in-scope operational partners

**\$550m+** total spend across the Group

**97%** of spend relates to engagement of service providers

**97%** tier 1 suppliers are based in Australia

# Our modern slavery risk

(Criterion 3 – Describe the risk of modern slavery practices in the operations and supply chains of the reporting entities)

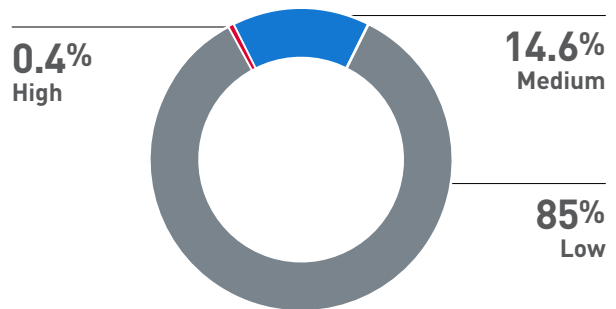
To determine our potential exposure to modern slavery risk in our operations and across our supply chain and operational partners, we utilise external resources and tools such as the Global Slavery Index to help identify the countries, sectors and commodities with high inherent risk.

Multiple years of experience have provided us a clearer view of modern slavery risk through third party assessments and the sharing of knowledge with industry peers and stakeholders. We have learned how modern slavery risk can shift and alter in response to supply and demand changes as well as regional or global events such as the COVID pandemic, geopolitical unrest and climate change. This experience is evolving our modern slavery risk management program to help optimise our impact and ability to monitor risk in real-time.

This year, we did not identify any change in the modern slavery risk for our third parties due to factors such as pandemic, climate change, geopolitical unrest and war, inflation or other macro impact. We are looking to adopt a new third-party technology platform to build our awareness of local, regional and global events that can or do impact human rights and modern slavery within our supply chain and operational partners.



Supply chain and operational partners – inherent risk







## Supply chain

Throughout the year we continued to assess inherent risk in our supply chain to identify medium to high-risk areas. We also extended our review of risk to the supply chain of Integrated Care Services Pty Ltd and Amplar Home Health Pty Ltd (both wholly owned and controlled subsidiaries of MPL) within the Amplar Health brand.

The highest risks in our supply chain are outlined next. We undertook due diligence of these areas during the year through actions outlined further along in this statement.

We are utilising a continuous improvement approach to illuminating and managing modern slavery risk in our supply chain, with an annual program of activities and milestones supporting our year-on-year maturity.

### Highest risks identified in our supply chain

Area	Potential for modern slavery risk
<b>Computer, digital equipment and office supplies</b> 	We procure computer and digital equipment such as laptops and mobile phones to support our operations. These goods are known to be manufactured in high risk countries with exploitative labour practices and using conflict minerals in earlier stages of their supply chains.
<b>Healthcare, medical equipment and supplies</b> 	We purchase medical consumables and equipment (e.g. pharmaceuticals, surgical gloves, PPE and surgical instruments) for our medical practitioners and homecare nurses. These products have a high risk of forced labour, both in their production of raw materials and in their manufacture.
<b>Sales and marketing merchandise</b> 	We procure branded products and promotional merchandise (e.g. clothing, stationery, novelty goods and small electronics), which are sourced indirectly via resellers from overseas suppliers. Some of these suppliers are located in countries listed as high risk on the Global Slavery Index (including in relation to forced labour and child labour).
<b>Property and construction</b> 	We perform property works to our offices and stores nation-wide. The labour associated to property and construction works are high risk for modern slavery.



# Our modern slavery risk

(Criterion 3 – Describe the risk of modern slavery practices in the operations and supply chains of the reporting entities)



## Operational partners

We continue to improve the way we identify and assess the modern slavery risk of our operational partners.

This year we broadened our review to include all contracted private hospitals. We acknowledge that while Australian-based hospitals have a low inherent risk, the risk increases at the tier 2 level (and beyond) due to the global nature of the goods and services they procure. For this reason, during FY23 we initiated a program for hospital agreements to include modern slavery provisions at onboarding, at renewal or by variation.

Our Overseas Student Health Care (OSHC) agents are 100% Australia-based, however some Australian headquartered agents have a multinational presence. Australian media reports have detailed cases of student worker and visa holder exploitation, as well as coercive and misleading agent behaviour. During FY23 we continued our program for agent agreements to include modern slavery provisions at onboarding, at renewal or by variation, and we continue to perform due diligence when engaging new agents.

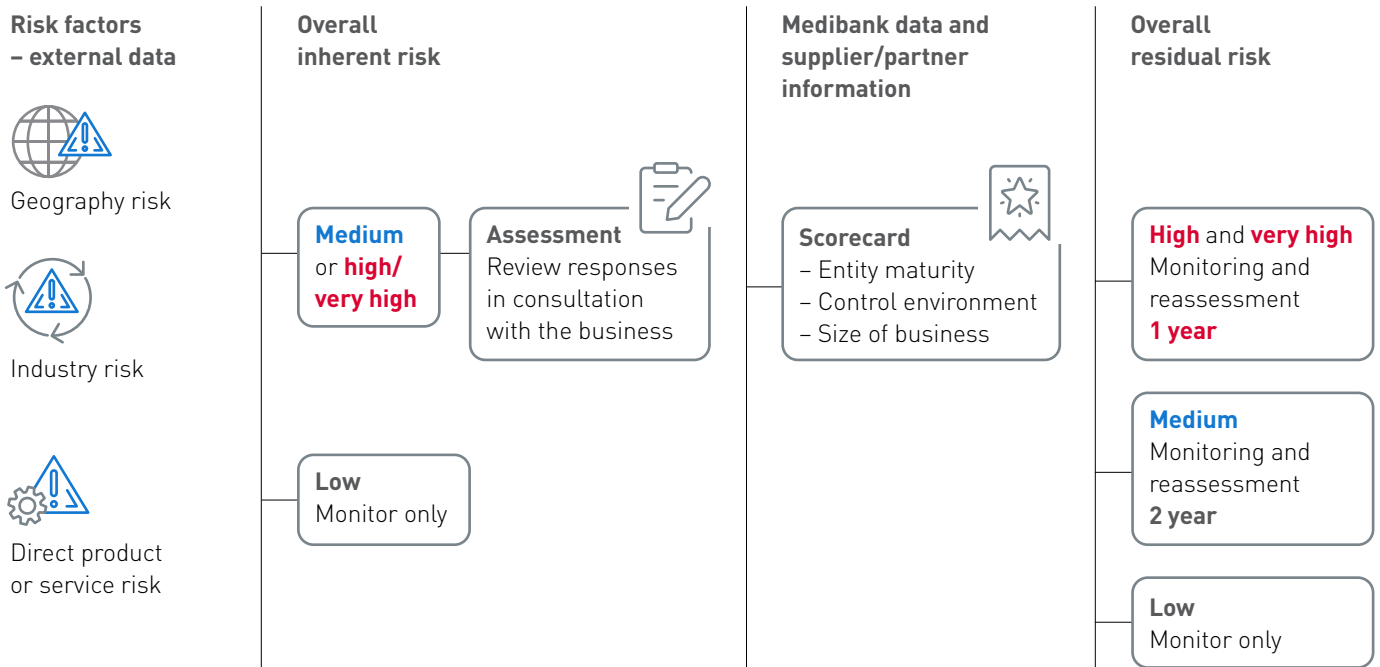
### Highest risks identified in our operational partners

Engagement	Potential for modern slavery risk
<b>Hospital agreement network</b> 	Our hospital agreement network is likely to have global supply chains whereby many of the goods they procure have potential risk exposure across all countries listed in the Global Slavery Index. Their labour suppliers such as cleaners and other base skill services are also high risk for modern slavery.
<b>Sales agents</b> 	We partner with agents to sell health insurance products to temporary visa holders on our behalf. People coming to Australia under a temporary visa are at high risk for modern slavery due to language barriers, lack of understanding of Australian law and worker rights, and vulnerability based on visa status. Some Australian based agents we engage also have an offshore presence in countries which are listed as having high risk of modern slavery on the Global Slavery Index.

# Our actions to assess the risk

(Criterion 4 – Describe the actions taken by the reporting entity to assess and address modern slavery risks)

We took a conservative approach and performed due diligence on suppliers and operational partners that are inherently medium to high risk.



In FY23 we published and promoted our Modern Slavery and Human Rights Risk Management Procedure across the Group to support a consistent approach to identifying and managing modern slavery risk and tracking our performance.

We continue to issue questionnaires to medium and high-risk third parties to understand their modern slavery risk controls in the areas of human rights, policies and procedures, supply chain management, recruitment and workforce management practices, and remediation practices and processes for risks or incidents.

We evaluate questionnaire responses and perform follow-up consultation directly with third parties if we require further clarification of controls. A residual risk rating is determined based on the questionnaire answers and information provided in concert with consideration of business size and maturity

and whether there is potential for risk within their direct operations or supply chain. With this information, we are able to plan risk reduction activities in consultation with the third party and set mechanisms for managing and monitoring the residual risk.

In FY23 our due diligence program identified a third party with an adverse association to modern slavery in its supply chain. Our approach and actions relating to this issue is set out on page 10.

Through our interactions with third parties, we have found that awareness and governance for modern slavery appears to be generally improving, however awareness of the Act and its associated requirements is low in some small to medium enterprises. Our ongoing work to raise awareness is outlined on pages 11 and 12.

# Our actions to assess the risk

(Criterion 4 – Describe the actions taken by the reporting entity to assess and address modern slavery risks)

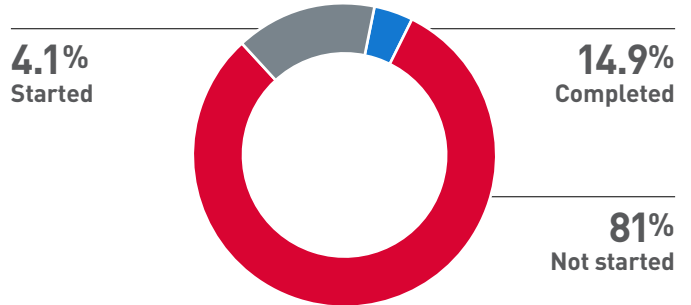
## Assessment of modern slavery risk

Our focus continues to be on areas where we identify the highest risk. In FY23 we sent our medium and high risk suppliers an assurance questionnaire to understand how they manage their modern slavery risks. We continue to connect with our suppliers to encourage participation and will be redesigning our onboarding process to facilitate a higher completion rate.

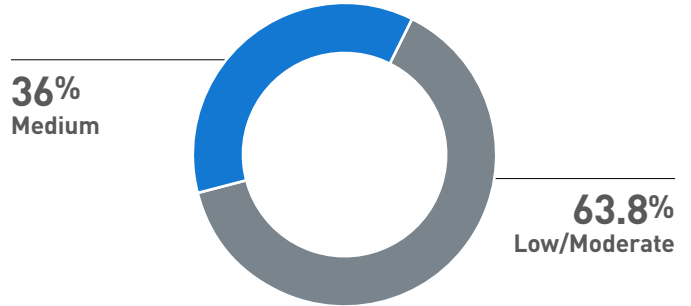
Note: In the fourth quarter of FY23, 42% of suppliers were new to our assurance program. The majority of these were part of our modern slavery program expansion to include Integrated Care Services and Ampliar Home Health suppliers. Those who have not yet completed their questionnaire are included in our follow-up communication program to encourage participation. Through industry collaboration, we understand that low participation rates are experienced across Australian businesses due to saturation and survey fatigue. Refer to the due diligence section of this document for further detail.

No high residual risk was encountered as a result of completed questionnaires.

### Modern slavery risk assessment participation rate



### Residual risk (completed assessments)



#### Case study

### Manufacturer of protective gloves



In August 2022, we became aware of media reports of US Customs sanctions on two protective glove manufacturers in Malaysia. The sanctions related to allegations of forced labour, human rights and business ethics issues.

Through discussions with our tier 1 local distributor, we discovered that some of the glove products we procure were sourced from one of the factories and that a US Customs and Border Security (CBP) Withhold Release Order (WRO) was in place due to reasonable indications of forced labour.

Following findings from a SMETA (Sedex Members Ethical Trade Audit) on the manufacturer's facility by an independent auditor, the CBP lifted the WRO.

We continue to source protective gloves through our distributor on the basis of its ongoing assurance around its supply chain and remain alert to potential risks associated with the manufacturing of these items into the future.

# How we're addressing risks

(Criterion 4 – Describe the actions taken by the reporting entity to assess and address modern slavery risks)

## Corporate governance

### Framework

To meet our responsibilities and obligations to our shareholders, stakeholders and employees, we have a framework of corporate governance policies and practices, internal controls and risk and compliance management processes. These are designed to promote responsible management and ethical conduct in a range of areas, including sustainable supply chains. Our corporate governance practices for the year ended 30 June 2023 are outlined in our [Corporate Governance Statement](#) (extracted from Medibank Annual Report 2023).

Our risk management framework is designed to effectively identify, assess, manage, monitor and report risks, including those related to modern slavery. Overall responsibility is held by the Board, which sets the risk appetite across the Group. We use a three lines of defence approach to define risk management roles, responsibilities and accountability. We also uplifted the modern slavery related controls and obligations tracked through our enterprise risk system.

The Medibank Code of Conduct sets out the way our employees including directors and executives, work and the practical principles and minimum standards of expected behaviour. Each year all our employees undertake mandatory compliance training in areas including risk, anti-bribery and corruption, privacy, and bullying and harassment.

In May 2023 we updated our [Responsible Investment Policy](#) to factor modern slavery into our investment decisions.

### Third-party risk governance strategy

We developed a third-party risk governance strategy in FY23 with a series of yearly step changes to mature us from 'reactive' to 'proactive'. Through this strategy, we are looking to introduce technology that provides a holistic view of risks associated with our third parties, including those related to modern slavery, financial, cyber security, safety, fraud and corruption. This technology would also enable us to automate and streamline how we manage these risks and facilitate meaningful risk-based conversations with our third parties to support ethical and responsible business practices.

## Whistleblowing

We encourage a speak up culture where it is safe for employees to raise concerns if something doesn't look right and for them to be protected if they do in accordance with our Whistleblower Policy. In the past year, Medibank received four contacts to Medibank Alert, which is an independently monitored reporting service operated by Deloitte. None of these contacts related to modern slavery issues in our operations or supply chain. We acknowledge that this doesn't necessarily mean that modern slavery issues don't exist in our business and will continue to assess the effectiveness of our mechanisms for raising concerns.

## Training

We continue to provide training to our people to help them make conscious choices in their purchasing decisions, both for work and in their personal lives. The program includes an e-learning module that raises awareness of modern slavery, instances of where it can occur, and the types of vulnerable people it impacts. The training module was completed by 100% of our Procurement team during FY23 as well as our key personnel in operational teams who cover higher modern slavery risk categories.

## Raising awareness

We acknowledge that one of the reasons modern slavery has been referred to as being 'hidden in plain sight'<sup>1</sup> is due to lack of awareness. This year we have undertaken a range of activities both internal to Medibank and externally to help raise awareness of modern slavery.

### External

The Pacific Australia Labour Mobility (PALM) scheme allows eligible Australian businesses to hire workers from nine Pacific islands and Timor-Leste when there are not enough local workers available. These workers are required to have health insurance for the duration of their time working in Australia.

To support the ethical and respectful treatment of PALM workers by their Australian employers, we are working with a range of approved employers to increase awareness of workers' rights and the importance of modern slavery provisions in their agreements.

### Case study

#### Webinar



Medibank led the Private Healthcare Australia Consortium (PHA) development of a webinar titled 'Top Tips to Help Your Business Tackle Modern Slavery' in October 2022. With an audience across corporate Australia including key partners and suppliers to Medibank, the webinar featured a panel of three expert speakers offering their insights and tips. With more than 270 registrations, participants reported that the webinar was useful to better understand modern slavery and actions they can take to manage risks in their own businesses and supply chains

1. [Hidden in Plain Sight – Parliament of Australia \[aph.gov.au\]](#)

# How we're addressing risks

(Criterion 4 – Describe the actions taken by the reporting entity to assess and address modern slavery risks)

## Case study

### Empowering international students



Media reports throughout the year have highlighted issues of coercion and exploitation experienced by international students when working in Australia. To help our insured international student customers, we highlighted the link to [know your rights \(studyaustralia.gov.au\)](https://www.studyaustralia.gov.au) in a newsletter sent to overseas student insurance sales agents early in 2023, which they are able to forward through to students.

## Internal

In FY23 we developed and published our Modern Slavery and Human Rights Risk Management Procedure and promoted it internally across our Management Assurance team. The document details the association to enterprise risk and a survivor-centred corrective action plan.

During the year we established a monthly Group-wide sustainability communication to promote key topics with our employees. In February 2023 we highlighted human rights and shared a link to our independent and confidential grievance reporting service that can be used for situations including modern slavery.

## Supplier due diligence

### External Partners' and Suppliers' Code of Conduct

In FY23 we updated our code to now be titled "External Partners' and Suppliers' Code of Conduct", which is accessible via our [sustainable procurement](#) internet site. The code now applies to all suppliers and operational partners.

The code references our [Human Rights Policy](#) and promotes the importance to Medibank of ethical treatment of people through all aspects of doing business. It also links to our [Whistleblower Policy](#) which provides an avenue for people to report concerns via the Medibank Alert hotline.

### Inherent risk assessment and assurance

Our due diligence program has now expanded to include inherent risk assessment of all tier 1 suppliers to the Medibank Group as well as our hospital agreement network. All suppliers with medium or high inherent risk have been issued assurance questionnaires. We will issue questionnaires to our hospital agreement network in FY24.

The assurance program has increased our awareness of the variety of relationship types we have with our third parties along with an appreciation of the size of these entities and their associated inherent risk. We will look to analyse the leverage we have across operational partners, so we can design the best approach to create impact.

### Contracting terms and conditions

Through contracting terms and conditions, we require our third parties to comply with our code and cascade business ethics responsibilities to their suppliers (our tier 2 suppliers). Agreement to the terms and conditions obligates third parties to participate in requests for information and to notify us if modern slavery is detected in their supply chains or operations. In FY23, we continued to include these terms and conditions for new sourcing activities as well as for variations to existing agreements.

We require OSHC agent entities to be registered with the Office of Migration Agents Registration Authority (OMARA). Some larger agent organisations are also mandatory reporting entities under the Act. To be registered, agents must pass a national police check and have completed education on migration law and practice which includes modules such as ethics, professional conduct and human rights. Agents registered with OMARA are also required to abide by the Australian Department of Home Affairs Code of Conduct for Registered Migration Agents, which includes general duties on ethical conduct, fair and respectful treatment of people and a duty not to make false or misleading claims.

We believe in partnering with our third parties to collectively influence the improvement of human rights practices. If we find misalignment to the expectations set out in our code and agreements, whereby remedial action does not bring the third-party practice into alignment, our last resort would be to plan and implement a transition away from that third party.

## Dedicated modern slavery resource

In FY23 we engaged a coordinator resource under the leadership of our Governance and Sustainability Manager whose responsibility is to drive continuous improvement in our modern slavery program. We prioritise activities with high potential for reducing modern slavery risk, as well as those that optimise ethical and sustainable operation and supply chain outcomes.

# Assessing our effectiveness

*(Criterion 5 - Describe how the reporting entity/entities assesses the effectiveness of these actions)*

We are committed to measuring and monitoring our performance to improve the effectiveness of our modern slavery program, and in turn our position on human rights.

In previous years, we established the reporting mechanisms and cadence for enterprise-wide leadership and Board reporting that covers our modern slavery risk and the progress of our actions. In FY23 this approach helped to keep modern slavery awareness at the fore across the Group as well as to support program maturity through the identification of improvement opportunities.

We continue to benchmark our progress against industry peers and other businesses by seeking advice from external experts, industry consortium members and other stakeholders. Our collaboration with private health insurers includes reviewing effectiveness and discussing improvements for the consortium's modern slavery risk assessment platform.

Outcomes from this approach include:

- Elevation of our risk assessment methodology to identify, assess and monitor our modern slavery risk
- An increasingly consistent and collective approach across industry, with each platform upgrade supporting the maturity of all members
- Better understanding third parties' awareness of modern slavery and their governance maturity, enabling us to tailor SMART (specific, measurable, attainable, relevant, time bound) risk reduction actions to lift their maturity

As we progress our continuous improvement program of work into FY24, we will mature our metrics in the areas of governance, due diligence and remediation, and education to track the effectiveness of our actions.

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## Consultation

*(Criterion 6 - Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls)*

Members of our Procurement team who are responsible for the Group's Modern Slavery program, meet with our Senior Executive fortnightly to review modern slavery initiatives and identify opportunities for continued improvement in the way we operate and procure.

Our legislative compliance actions are substantiated by a Modern Slavery Working Group comprising representatives from Legal, Sustainability, Ampliar Health, Compliance and

External Affairs. We engaged the Working Group for the development of this FY23 statement to cover modern slavery risk across the Group.

We will continue to consult with senior executives of each reporting entity to support a consistent approach to how we review our operations and actions.

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## Industry collaboration

We have also been a member of the Private Healthcare Australia (PHA) Modern Slavery Act Community of Interest group since 2019. The PHA is the Australian private health insurance industry's peak representative body. This group provides another avenue for shared learning, benchmarking and capacity building around modern slavery and human rights within the industry, which will continue to be a focus in FY24.

We have also collaborated with modern slavery and human rights experts throughout FY23 including, but not limited to Anti-Slavery Australia, Red Cross, and Givvable, as well as attending consortiums and webinars such as the ESG Procurement Conference.

# Next steps

In FY24 we will focus on three key areas to enable us to progress and positively influence the prevention of modern slavery in our supply chain and operations. These pillars and focus areas are:

## Pillars



## Focus areas

- Continue roll-out for the inclusion of human rights provisions into third party agreements at onboarding, at renewal or by variation
  - Promote our updated External Partners' and Suppliers' Code of Conduct
  - Work towards the first step change in our third-party risk management uplift program
  - Review our Human Rights Policy
- 



- Continue risk assessment of our supply chain and operational partners, including prioritising the highest risk for review beyond tier 1
  - Improve resilient and ethical supply chain outcomes by streamlining and automating our responsible sourcing risk assessment approach
  - Review processes to improve lifecycle supplier risk management including with respect to visibility of risk and accountability
  - Include modern slavery metrics in holistic third-party risk reporting for Group xexecutive communications
  - Deep dive analysis of leverage across our third parties to determine where we can have the most impact
  - Send assurance questionnaires to all partners in our hospital agreement network
- 



- Continue to raise awareness of modern slavery and human rights with our employees and third parties
  - Explore options to educate our retail and contact centre employees on what to do if they suspect or detect modern slavery in practice when interacting with the public and customers
  - Explore processes and tools where we can embed communication of worker rights to overseas health cover customers
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**medibank**

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