

Modern Slavery

2023 – 2024 financial year

Contents

1	Introduction	3
2	Our business, governance structure and operations	3
2.1	Summary	3
2.2	Business	3
2.3	Summary of our FY24 Service Portfolio	4
2.4	Governance Structure	5
2.5	Operations and Supply Chain	5
3	Modern slavery risk management initiatives	6
4	Ensuring effectiveness of the program	7
5	Moving forward	7
6	Approval	8

Healthdirect Australia acknowledges the Traditional Owners of Country throughout Australia and their continuing connection to land, sea and community. We pay our respects to the Traditional Owners and to Elders both past and present.

1 Introduction

As a Commonwealth company, Healthdirect Australia Limited (Healthdirect) has a responsibility to combat the risks of modern slavery in our business and supply chain. We expect our suppliers to demonstrate the same commitment.

In respect of financial year 1 July 2023 to 30 June 2024 (FY24), Healthdirect continued developing its processes to address modern slavery in its organisation and in its supply chain. This included:

- (a) ensuring that any new contractual arrangements entered include mandatory obligations on suppliers to comply with modern slavery laws; and
- (b) developing an awareness of best practice in industry with regards to modern slavery and considering the appropriate measures needed to be adopted by Healthdirect as a government-owned entity.

This statement has been prepared in accordance with the *Modern Slavery Act 2018 (Cth)* (Act) in respect of FY24. This statement has been prepared in consultation with senior executives within our business.

2 Our business, governance structure and operations

2.1 Summary

Healthdirect Australia is a national leader in digital health, offering 24/7 accessible health information through its helpline, website, and app. Partnering with Federal and State governments, Healthdirect delivers essential services like the nurse triage, Symptom Checker, Service Finder, and virtual GP consultations, ensuring equitable healthcare access across Australia, including remote areas. With a commitment to innovation and health equity, Healthdirect continues to support Australians' health needs and contributes to public health goals nationwide.

Healthdirect Australia is headquartered in Sydney, New South Wales. For FY24, Healthdirect had annual revenue of \$191,417,759, with a significant portion of this revenue used to fund outsourcing costs for our services. We do not have any subsidiaries. Healthdirect is funded by its shareholders: the respective health departments of the Commonwealth Government, the Australian Capital Territory, New South Wales, the Northern Territory, Queensland, South Australia, Tasmania, Victoria and Western Australia.

2.2 Business

The principal activities of the Company during FY24 were:

- i) Delivering publicly funded health and virtual care services, as well as designing and implementing digital health solutions on behalf of all Australian governments; and
- ii) Providing Australians with access to timely, accurate health information and connecting them to the most suitable health services for their needs, wherever and whenever assistance is required.

2.3 Summary of our FY24 Service Portfolio

1. **healthdirect** - A government-funded service offering Australians 24/7 access to reliable health advice and information through a dedicated helpline and various digital channels, empowering individuals to make informed decisions about their health.
2. **GP Helpline** - This safety-net service provides after-hours access to GP advice for people in rural and remote areas, reducing the need for hospital emergency visits. In some states it operates 24/7 across all geographies. It operates as an extension of the healthdirect helpline, offering essential support during off-peak hours.
3. **National Health Services Directory (NHSD)** - A national directory that helps Australians locate nearby healthcare services and providers, including hospitals, general practices, mental health, and allied health services. Developed with the Australian Digital Health Agency, NHSD supports coordinated, efficient access to essential health information across the healthcare system
4. **My Aged Care** - A Commonwealth-funded service assisting older Australians and their families in navigating the aged care system. Healthdirect operates the national helpline, offering guidance on available services, eligibility, and application processes. The My Aged Care website provides a comprehensive resource for aged care information and service listings, helping users make informed care decisions and plan for future needs. This service ensures streamlined access to aged care support and information.
5. **Healthdirect Video Call** - A secure telehealth platform that allows clinicians to connect with patients across Australia, breaking down barriers of distance, time, and cost. Supporting primary, secondary, and tertiary care, it enhances access to healthcare in remote and underserved areas. In partnership with the Commonwealth Government and Primary Health Networks (PHNs), healthdirect Video Call has expanded telehealth capabilities, ensuring Australians can access timely care, regardless of location.
6. **Pregnancy, Birth and Baby** - A Commonwealth-funded national service managed by Healthdirect that supports parents, families, and carers of children up to five years old. Offering free, non-judgmental guidance via a helpline, video, and online resources, Pregnancy, Birth and Baby covers essential topics such as pregnancy, childbirth, and early childhood development. The service connects families with valuable information and resources, helping them make informed decisions and feel supported through early stages of parenthood.
7. **Head to Health** - In partnership with the Commonwealth Government, Healthdirect's Head to Health initiative connects Australians with trusted, evidence-based mental health services and resources. This platform offers a comprehensive range of digital tools, from self-help options to professional support, providing an accessible entry point for mental health assistance in a supportive environment.
8. **Ambulance Secondary Triage** - In collaboration with state and territory ambulance services, this program provides a secondary triage for non-urgent ambulance calls, ensuring emergency resources are prioritized for critical cases. By directing non-critical patients to appropriate healthcare services, it alleviates pressure on emergency departments, enhancing the efficiency of ambulance services and supporting improved patient outcomes.

We also operate several smaller scale health services, both temporary and ongoing, using a variety of delivery channels, including helplines.

2.4 Governance Structure

As a public company regulated under the *Corporations Act 2001 (Cth)* and limited by shares, Healthdirect Australia is governed by a Board of Directors (Board) appointed by a Shareholder Committee. The Board oversees two internal committees which assist in carrying out its responsibilities: the Clinical Governance Advisory Committee, and the Finance, Risk Management and Audit Committee.

The Board appoints a Chief Executive Officer. The business has five key divisions (*Service Operations and Engagement, Platform, Corporate Services, Clinical Governance, and Insights*), with the executive managers of each division comprising the Executive Team.

2.5 Operations and Supply Chain

Healthdirect Australia operates from a headquarters in Sydney, Australia. We outsource our call handling and some other operations to third-party service providers. All call handlers in our outsourced call centres are based in Australia. Our shareholders are exclusively Australian governments, namely: the Australian Commonwealth Government, the Australian Capital Territory, New South Wales, the Northern Territory, Queensland, South Australia, Tasmania, Victoria and Western Australia.

We focus on consistent arrangements with suppliers that maintain a high standard of compliance throughout their operations. The majority of our 245 active suppliers are based within Australia. We do not manufacture any goods ourselves. During the reporting period our Top 20 Suppliers accounted for over 92.6% of our total supplier spend. We have a comprehensive understanding of these top suppliers and continually work with our direct suppliers to further understand their own supply chains and associated risks.

We work with both trade and non-trade suppliers directly:

- (a) **trade suppliers** provide the key services we provide to consumers including contact centre services, digital platforms and telephony; and
- (b) **non-trade suppliers** provide goods and services to support our effective operations and administrative functions. Our biggest non-trade categories include:
 - (i) corporate IT;
 - (ii) professional services;
 - (iii) marketing;
 - (iv) audit and compliance;
 - (v) security services; and
 - (vi) facilities and office management.

3 Modern slavery risk management initiatives

In FY24, Healthdirect launched a comprehensive Third-Party Risk Management (TPRM) framework with assistance from KPMG to enhance the monitoring and mitigation of supply chain risks, particularly around modern slavery, ESG compliance, and regulatory obligations. The TPRM framework ensures that suppliers' adherence is rigorously assessed against statutory and regulatory standards, including the *Modern Slavery Act 2018 (Cth)*. It requires suppliers to disclose all relevant policies, report any known incidents, outline mitigation and remediation strategies, and provide supporting evidence, with specific protocols for both national and international suppliers.

Building on this framework, we have strengthened our contract arrangements with our contact centre providers. The updated clauses now require suppliers to ensure their operations and supply chains are free from modern slavery practices and to maintain a comprehensive modern slavery risk management plan. These ongoing

enhancements embed greater compliance, transparency, and accountability in our supplier relationships, reinforcing Healthdirect's commitment to human rights and social responsibility across our supply chain.

We continue to uphold robust practices to ensure compliance and accountability across supplier relationships, including a modern slavery risk reporting mechanism and a whistleblower policy that protects individuals who raise concerns. Identified risks are assessed by our legal team and may be escalated for further investigation, with corrective actions in place for serious non-compliance. Through ongoing collaborative remediation efforts and preventive actions, Healthdirect reinforces its commitment to ethical standards and modern slavery prevention throughout the supply chain.

Healthdirect continuously enhances its approach to modern slavery risk management by requiring the Commercial team to complete annual training through the Chartered Institute of Procurement and Supply, including the Ethical Procurement and Supply Chain course. This ongoing training strengthens our team's ability to identify and address modern slavery risks.

4 Ensuring effectiveness of the program

Healthdirect remains committed to maintaining an ethical and responsible supply chain by implementing our comprehensive Third-Party Risk Management (TPRM) framework. We further review our TPRM framework and supplier operations with periodic internal audits, the first of which was a post-implementation audit of the TPRM that was completed during FY24. Following that review we further enhanced the TPRM framework to include a consolidated ESG-focused questionnaire. This updated questionnaire merges elements of Environmental, Social, and Governance (ESG) considerations with Diversity, Equity, and Inclusion (DEI), and Modern Slavery compliance, is issued as an ESG attestation to both new and incumbent suppliers annually.

Healthdirect has partnered with Givvable Pty Ltd, an AI-powered sustainability intelligence platform that automates supplier due diligence and sustainable procurement to meet ESG requirements. Leveraging insights from an internal audit of our TRPM processes, Givvable provides Healthdirect with a centralised tool for monitoring and verifying supplier sustainability credentials. This partnership reinforces Healthdirect's commitment to responsible procurement, enabling transparent, streamlined compliance oversight and supporting stronger, ethically aligned supplier relationships.

As our partnership with Givvable evolves, we are working to leverage their platform to elevate our ESG processes further, with the aim of replacing the current ESG focused questionnaire with an integrated, automated solution. This solution will streamline the vetting of new suppliers and the ongoing management of incumbent suppliers, enhancing efficiency and strengthening our ability to meet ESG and compliance standards.

5 Moving forward

Healthdirect is committed to strengthening its modern slavery risk management through enhanced supplier engagement, periodic internal audit reviews, contract updates, procurement improvements, and reporting enhancements. Moving into FY25, Healthdirect will build on the work completed in FY24 to further improve our modern slavery risk management processes across our supply chain through the following actions:

- Implement a supplier code of conduct to promote ethical standards and accountability among all suppliers, include modern slavery standards. Continue to undertake modern slavery risk assessments using the TPRM framework for all new suppliers and existing suppliers annually.
- Utilise Healthdirect's supplier management framework and contract manager community, to routinely track supplier's compliance to modern slavery contract obligations and follow up suppliers' remediation of any identified issues.

6 Approval

We did not identify any modern slavery practices within our operations or our supply chain during FY24 on the basis of our Modern Slavery and ESG Compliance program.

This Statement is made by Healthdirect Australia Limited for the financial year ending 30 June 2024. This Statement was approved by our Board of Directors on 11 December 2024 for the purposes of Section 16(2)(a) of the Act.

Date: 11 December 2024

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Level 4, 477 Pitt Street, Haymarket, NSW 2000
P (02) 9263 9000
W about.healthdirect.gov.au
ABN 28 118 291 044