

# Modern Slavery

2024 - 2025 financial year

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*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

Healthdirect Australia's Modern Slavery and Environmental, Social, and Governance (ESG) compliance activities did not identify any instances or indicators of modern slavery within our operations or supply chain during FY2025. This Statement outlines the actions taken during the reporting period to assess, manage, and mitigate modern slavery risks across our organisation and supplier network.

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 2024 to 30 June 2025 (FY2025), 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;
- (b) building on our 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; and
- (c) the development and implementation of Healthdirect's Supplier Code of Conduct (Code), which sets clear minimum standards of behaviour for suppliers across areas such as labour and human rights, workplace safety, business integrity, and the prevention of modern slavery practices. The Code is publicly available; forms part of our onboarding and contract management processes and reinforces Healthdirect's commitment to ethical sourcing and responsible supplier relationships.

This statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (Act) in respect of FY2025. This statement has been prepared in consultation with senior executives within our business.

## 2 Our business, governance structure & 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 FY2025, Healthdirect had annual revenue of \$206,900,767 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, South Australia, Tasmania, Victoria, Queensland and Western Australia.

### 2.2 Business

The principal activities of the Company during FY2025 were:

- (a) Delivering publicly funded health and virtual care services, as well as designing and implementing digital health solutions on behalf of all Australian governments; and
- (b) 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 FY2025 service portfolio

- (a) **Health Information and Advice Service (HIAS)** - 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.
- (b) **GP Helpline** - This safety-net service provides after-hours and in some circumstances in-hours access to GP consultations for people in rural and remote areas, reducing the need for hospital emergency visits. It operates as an extension of the Healthdirect helpline, offering essential support during off-peak hours.
- (c) **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
- (d) **My Aged Care (MAC)** - 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. This service ensures streamlined access to aged care support and information.
- (e) **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.

- (f) **Pregnancy, Birth and Baby (PBB)** - 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, PBB 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.
- (g) **Medicare Mental Health (MMH)** - formerly *Head to Health (H2H)* - In partnership with the Commonwealth Government, Healthdirect's 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.
- (h) **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 (*Chief Executive, Services and Technology, Corporate Services, Quality, Safety and Experience, 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 235 active suppliers are based within Australia. During the reporting period our Top 20 Suppliers accounted for over 93.4% 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, consumption based 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 services and software;
  - (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 FY25, Healthdirect Australia continued to strengthen and embed its comprehensive Third-Party Risk Management (TPRM) framework as part of business-as-usual procurement and supplier management practices. The framework remains a core mechanism for monitoring and mitigating supply chain risks, including those relating to modern slavery, ESG compliance, and broader regulatory obligations. Under this framework, suppliers are required to disclose relevant policies, report incidents, outline mitigation and remediation strategies, and provide supporting evidence. Supplier adherence is rigorously assessed against statutory and regulatory standards, including the *Modern Slavery Act 2018 (Cth)*, with tailored protocols applied to both national and international suppliers.

In line with this framework, Healthdirect has maintained strengthened contractual obligations with key suppliers, including contact centre workforce providers. These contract clauses require suppliers to ensure that their operations and supply chains remain free from modern slavery practices and that they maintain effective risk management plans. By embedding these obligations into our supplier relationships, Healthdirect ensures ongoing compliance, transparency, and accountability, reinforcing its commitment to human rights and social responsibility across the supply chain.

A significant initiative during FY25 was the development and implementation of Healthdirect's Supplier Code of Conduct

(Code). The Code establishes clear minimum standards for suppliers across areas such as labour and human rights, workplace safety, business integrity, privacy and security, and the prevention of modern slavery. The Code is publicly available, will be referenced in tendering, and forms part of onboarding processes and is reinforced through ongoing contract management and supplier engagement activities. This initiative formalises Healthdirect's expectations of suppliers and strengthens alignment with ethical and sustainable procurement practices.

Robust practices remain in place to ensure compliance, 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 where required, with corrective actions in place for serious non-compliance. Through ongoing collaborative remediation efforts and preventive actions, Healthdirect continues to promote ethical standards and modern slavery prevention throughout the supply chain.

As a part of its ongoing commitment, Healthdirect requires all members of its Commercial team to complete annual training through the Chartered Institute of Procurement and Supply (CIPS), including the Ethical Procurement and Supply Chain course. This ongoing training and investment in capability strengthens our team's ability to identify and address modern slavery risks.

## 4 Ensuring effectiveness of the program

Healthdirect Australia remains committed to maintaining an ethical and responsible supply chain through the ongoing application of our comprehensive Third-Party Risk Management (TPRM) framework. Recognising that business needs and legislation continue to evolve, the framework is subject to annual audits and has been designed to remain agile and adaptable, ensuring it continues to provide effective oversight and support continuous improvement. In support of this, Healthdirect has a dedicated ESG Framework, under which suppliers are required to complete an annual questionnaire. This consolidated questionnaire integrates Environmental, Social, and Governance (ESG) considerations with Diversity, Equity, and Inclusion (DEI) and modern slavery compliance requirements, and is issued to both new and incumbent suppliers.

Through its partnership with Givvable Pty Ltd, Healthdirect continues to leverage an AI-powered sustainability and compliance platform strengthen the effectiveness of its Third-Party Risk Management (TPRM) framework. The platform provides a centralised tool for monitoring and verifying supplier sustainability and ESG and modern slavery credentials. By integrating Givvable into procurement and contract management processes, Healthdirect has improved efficiency, enhanced transparency, and reinforced its commitment to responsible and sustainable procurement. The insights gained are used not only to validate compliance but also to inform supplier development and support more coordinated efforts to raise standards across the supply chain.

Healthdirect's commitment to continuous improvement is also reinforced through the establishment of a dedicated ESG Governance Committee. The Committee responsibilities include overseeing supplier ESG performance, and guiding improvements across the supply chain, including modern slavery risk management. This ESG governance function is supported by strengthened internal capability in sustainability measurement and impact, enabling Healthdirect to take a more coordinated approach to analysing ESG and modern slavery data, building internal awareness, and encouraging suppliers to strengthen their practices in preventing modern slavery and upholding broader ESG standards.

The development and introduction of Healthdirect's Supplier Code of Conduct (Code) enhances the effectiveness of Healthdirect's modern slavery risk management program by translating its principles into clear, consistent expectations for suppliers. By defining minimum standards across areas such as labour and human rights, workplace safety, integrity, and the prevention of modern slavery, the Code provides a consistent framework against which supplier practices can be evaluated. From FY26 we will be circulating the Code to all suppliers reinforces accountability and ensures these standards guide procurement and contract management activities, supporting responsible conduct and continuous improvement across the supply chain.

## 5 Moving forward

Healthdirect Australia has now established all the major foundations to support its modern slavery risk management program including strengthened governance frameworks, enhanced supplier engagement mechanisms, periodic internal audits and reviews, contract and reporting updates, and procurement improvements. Moving into FY26, Healthdirect will consolidate these foundations through maturity, adoption and continuous improvement ensuring controls are consistently applied and refined across all areas of procurement and supplier management.

To support this ongoing effort, Healthdirect will continue to strengthen its approach through the following key actions:

- Complete distribution of the Supplier Code of Conduct (Code) to all vendors, ensuring consistent awareness of Healthdirect's standards and expectations relating to modern slavery, ethical conduct, and ESG responsibilities.
- Through the uplift of Healthdirect's Supplier Management Framework, working with contract managers and contract service owners across the organisation to be more aware of the requirements of the Modern Slavery risk management and build it into their normal supplier engagement activities. This may include using the ESG questionnaire responses and Givvable data to better understand supplier performance. Building these activities into our normal supplier management activities will enable the business to raise awareness, close capability gaps, and improve supplier practices across modern slavery and ESG dimensions.
- Continue to develop and embed the role of Healthdirect's ESG Governance Committee in establishing benchmarks, providing oversight, and guiding continuous improvement in ESG and modern slavery performance across the supply base.
- Continue to undertake modern slavery risk assessments using the TPRM framework for all new suppliers and conduct annual reassessments of existing suppliers, maintaining comprehensive coverage across Healthdirect's active and higher-risk supplier base.
- Progress work towards organisational recognition from the Chartered Institute of Procurement and Supply (CIPS) for the Ethics Mark,<sup>1</sup> reinforcing Healthdirect's commitment to ethical procurement practices within the public sector.

1. **CIPS Ethics Mark:** An accreditation awarded by the Chartered Institute of Procurement & Supply (CIPS) recognising organisations that demonstrate ethical procurement practices and maintain all staff on the CIPS Ethics Register. [Available at: [Ethics Register](#) | [CIPS](#)]

## 6 Approval

**We did not identify any modern slavery practices within our operations or our supply chain during FY2025 on the basis of our Modern Slavery and ESG Compliance programme.**

This Statement is made by Healthdirect Australia Limited for the financial year ending 30 June 2025. This Statement was approved by our Board of Directors on 28 November 2025 for the purposes of Section 16(2)(a) of the Act.

Date: 28 November 2025



Professor Christine Kilpatrick AO  
Chair of the Board of Directors  
Healthdirect Australia Limited  
Date: 28 November 2025

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