



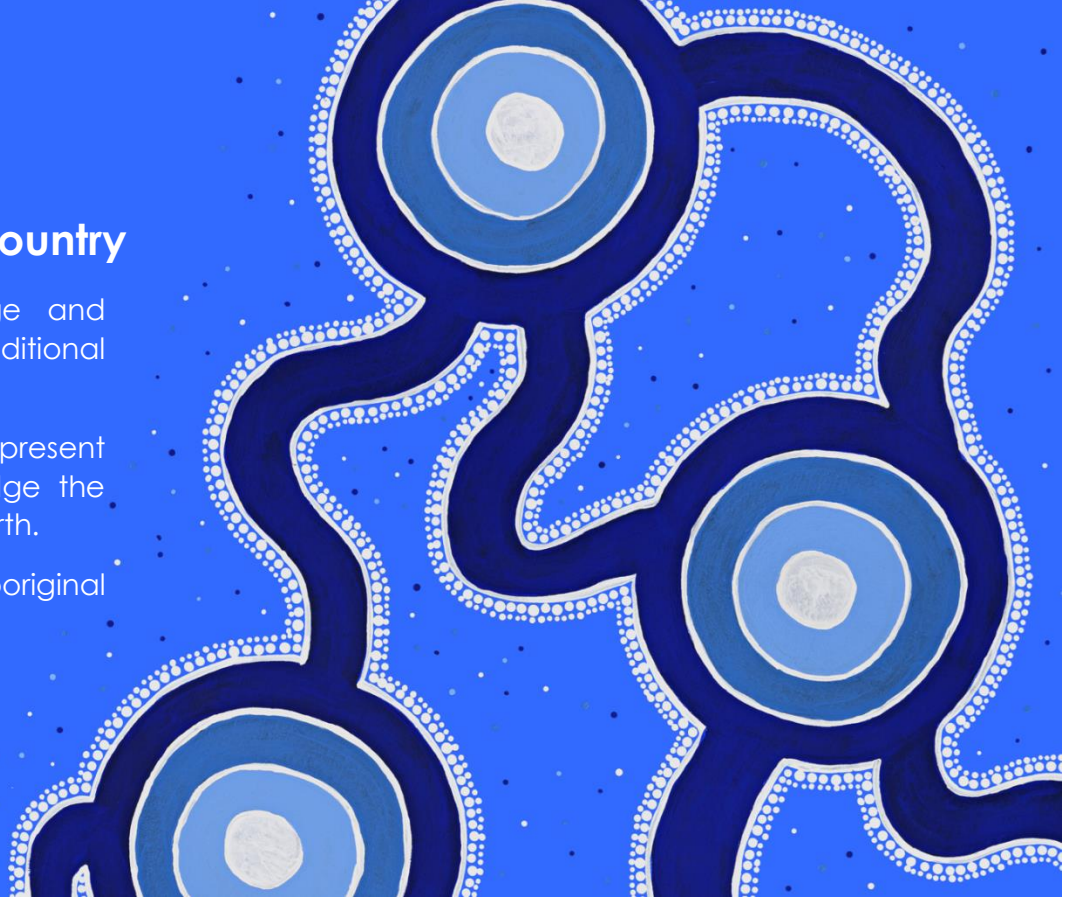
Hearing Australia
Modern Slavery Transparency Statement 2023

Acknowledgment of Country

Hearing Australia acknowledge and pay our respects to the many Traditional Owners of the lands.

We pay respect to Elders past, present and emerging and acknowledge the longest continuing culture on Earth.

And extend our respect to all Aboriginal and Torres Strait peoples.



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Company Overview

Hearing Australia is the nation's leading hearing services provider and we have been providing all Australians with hearing health care and solutions since 1947.

Hearing Australia has provided expert hearing care to Australians of all ages and committed to helping people across the nation stay connected to their families and communities.

We are the nation's largest provider of government-funded hearing services for children, young adults up to the age of 26, eligible Aboriginal and Torres Strait Islander people, pensioners and veterans and invite you to find out more about the nature of our business by following this link to our web page: [Home – Hearing Australia](#).

Introduction

This statement sets out the steps Hearing Australia took to address Modern Slavery risks in our organisation and supply chain for the financial year ending 30 June 2023, pursuant to the [Modern Slavery Act 2018 \(Cth\)](#).

This statement is submitted by Hearing Australia in response to the Act and builds upon the initiatives contained in prior statements. Hearing Australia remains committed to operating with the highest levels of compliance, ethics, and governance. This includes a commitment to human rights and the elimination of modern slavery across our supply chain.

Structure and Operations

Hearing Australia is a statutory authority established under the [Australian Hearing Services Act 1991](#) and is defined as a corporate Commonwealth entity under the [Public Governance Performance and Accountability Act 2013](#).

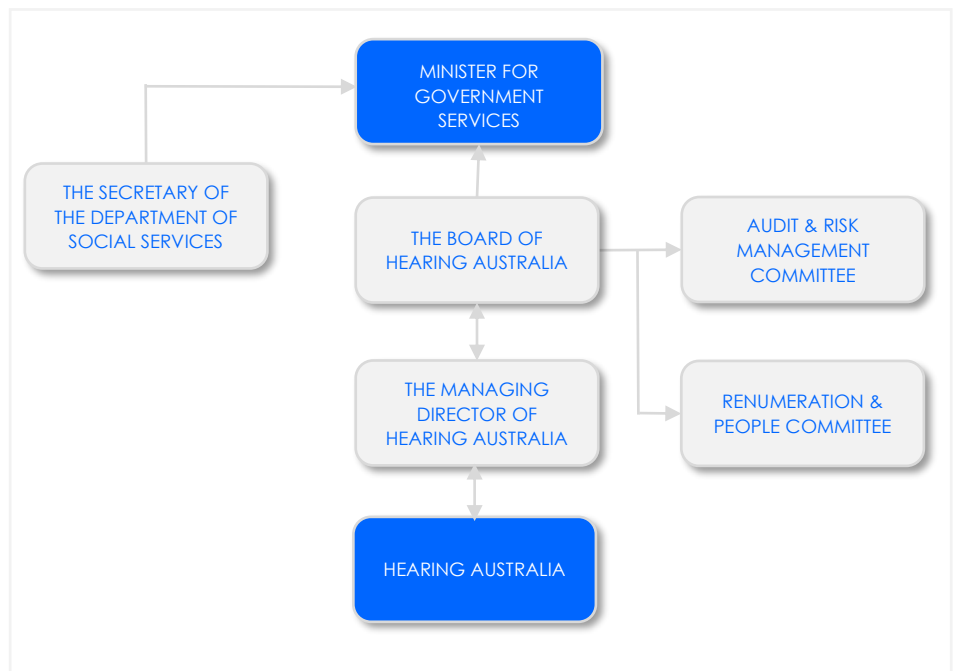
Through our Board of Directors, Hearing Australia is accountable to the Minister for the National Disability Insurance Scheme (NDIS) and Minister for Government Services, the Hon Bill Shorten (Minister) whom appoints Hearing Australia's Board.

Hearing Australia is a Corporate Commonwealth Entity ("CCE") and does not own or operate any other subsidiaries.

Board and Governance Structure

Hearing Australia's Board of Directors (Board) consists of highly credentialed Directors whom have significant expertise, experience and industry knowledge.

The Board oversees our performance, effectiveness and strategic direction including Hearing Australia's governance policies and practices and accountable for ensuring that Hearing Australia performs its functions in an ethical and economical manner.



Hearing Australia – Modern Slavery Transparency Statement

The [Modern Slavery Act 2018](#) (Act) requires our business to disclose the efforts we have employed to ensure that our supply chain is free of slavery and human trafficking.

Victims of modern slavery experience some of the most severe breaches of human rights in the world today which is irreconcilable with Hearing Australia's values.

We take this opportunity to state that we acknowledge our obligations under the Act, and we believe that our policies and procedures reflect our commitment and corporate responsibility in identifying potential human rights breaches across our supply chain.

We take a zero-tolerance position on human rights breaches and commit to eradicating all forms of slavery, servitude, forced labour and human trafficking across our network and undertake to perform our corporate responsibilities purposefully and with integrity.

As a leader in our field, Hearing Australia fully understand that we must play our part in combatting modern slavery and this requires traceability, transparency, and collaboration with our suppliers and supply chain partners.

Supply Chain

Hearing Health and Care Products

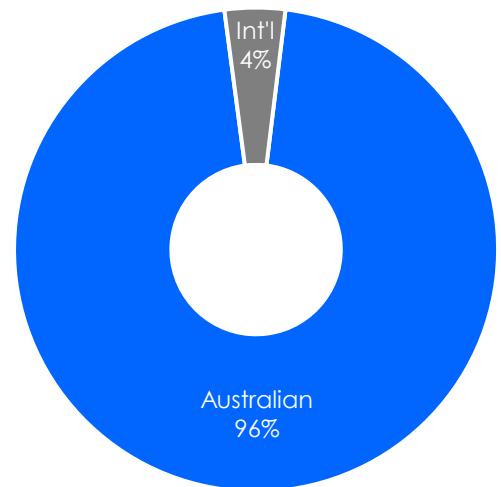
In financial year ending 2023, Hearing Australia procured 95.9% of our goods and services from locally based Australian companies, the balance of 4.1% were ethically sourced from reputable global organisations.

Our supply chain consisted of 1558 suppliers and is relatively stable as we engage with local Small to Medium Enterprises (SME's) as part of our procurement strategy.

The complexity in our product supply chain resides across the manufacture and distribution of products, which includes but not limited to:

- Hearing Aids & Moulds
- Listening Devices
- Consumables & Batteries
- Clinical Equipment

FY23 Australian vs International Supply Chain by %

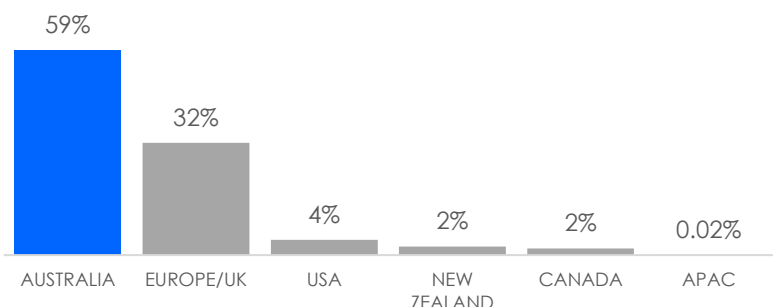


Product Supply Distribution

International products are sourced from suppliers with manufacturing bases and head offices in Europe and the UK with our primary hearing aid supplier being headquartered in Denmark.

The balance of our product supply is sourced from locally based Australian owned and operated suppliers and manufacturers, representing 59% of our overall supply chain.

FY23 Supply Chain by Country / Region



Operational Products and Services

Hearing Australia also purchases Information Technology Equipment from local suppliers and includes: *Laptops, monitors, tablets, and mobile phones.*

These are sourced from recognised and reputable global brands which are commonly accepted as being predominately manufactured in Asia-Pacific regions.

Professional services and office supply are generally sourced locally and are necessary to support the organisations operations.

These include goods and services such as: *Telecommunications, property leasing, sales and marketing support, property maintenance, logistics, stationery, and branded clothing.*

Procurement

Procurement Practices

Hearing Australia operates in accordance with the Commonwealth's Procurement Rules (CPR) pursuant to sec.105B (1) of the Public Governance, Performance and Accountability Act 2013 and our Procurement practices are subject to these provisions.

In addition, Hearing Australia prescribes to the United Nations Sustainability Goals (UNSDG's) and the International Labour Organisation Conventions (ILO).

Modern Slavery Risk Management

Hearing Australia's modern slavery risk is managed by our dedicated Procurement division who regulate our procurement practices and processes.

Our preliminary risk profiling of FY23's supply chain did not identify Modern Slavery breaches or infringements due to our considered supplier selection processes.

Modern Slavery Program

In FY23, our approach to modern slavery management was reviewed and refreshed. Some enhancements include the introduction of:

- Supplier Code of Conduct
- Supplier Modern Slavery Packs
- Modern Slavery Training Modules
- Annual Supplier Information Forms
- Annual Supplier Modern Slavery Act Questionnaires
- Strengthening of Hearing Australia's Modern Slavery Statement

To maintain our supply chain integrity and ensure our suppliers remain compliant with the Act and other applicable laws, our Procurement division ensures:

1. Hearing Australia - Supplier Code of Conduct

- New suppliers receive a copy of our Hearing Australia's Supplier Code of Conduct (CoC) which sets out the standards of behaviour and conduct required to become and remain a Hearing Australia supplier.
- Requires existing suppliers to remain compliant and resign the CoC annually.
- Expects all our suppliers to meet and commit to the provisions set out in the CoC.

2. Modern Slavery Act Questionnaire (MSAQ)

- Ensures new and existing suppliers complete and submit their Modern Slavery Act Questionnaire (MSAQ) annually.
- Including details on the "supplier's supplier" (eg; Risks, location, operations etc)

3. Supply Chain Modern Slavery Risk Reviews

- Undertake modern slavery risk reviews across our supply chain irrespective of size, sector, headquarters location or structure of the supplier.
- Continually monitor our supply chain to ensure we are alerted to any modern slavery violations, sanctions or infringements that give rise to investigation.
- Conduct or arrange site audits of suppliers categorised as high risk or deemed a potentially high risk.

4. Supplier Information Forms

- Ensure suppliers complete and submit Supplier Information Forms annually to provide suppliers the opportunity to advise us of:
 - i. Internal changes to their operations.
 - ii. Active or past Modern Slavery infringement, sanctions or violations that may not be publicly available.

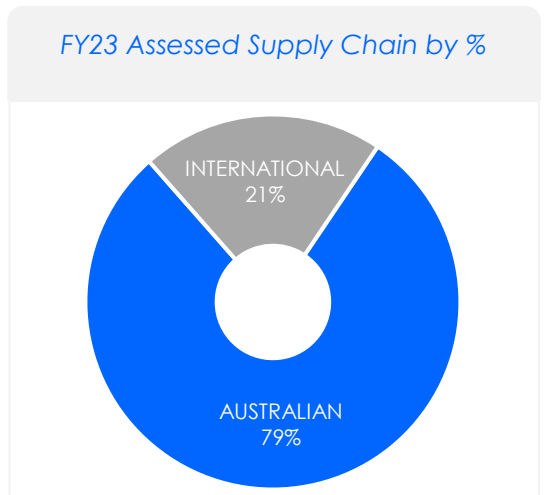
Modern Slavery Assessments

Modern Slavery assessments were undertaken across our suppliers with an annual expenditure of >\$250k. Excluded where Government agencies and property lease companies (eg; Agents and Landlords). Each assessed supplier received a Modern Slavery Pack which includes:

- Hearing Australia Supplier Code of Conduct
- Modern Slavery Act Questionnaire (MSAQ)
- Supplier Information Form
- A copy of the Modern Slavery Act 2018 (Cth)
- Access to free Modern Slavery training
- Information on Modern Slavery and risks
- Information related to the United Nations and International Labour Organisation

Of the assessed suppliers, 79% were Australia based and the remaining 21% located offshore, namely, Denmark, Switzerland, Finland, Austria, New Zealand, and the USA.

Consistent with previous reporting periods, our modern slavery risk profile remained low in FY23.



Supplier Management

Supplier Contracts

Hearing Australia's preferred suppliers are under formal contracts agreements with terms ranging from 3 -10 years and include Modern Slavery provisions.

Each supplier must comply with our Supplier Code of Conduct and submit annual Modern Slavery Questionnaires as part of their ongoing compliance requirements.

Supplier Code of Conduct

Hearing Australia continually reviews of our internal policies and undertake formal reviews of our suppliers to achieve full transparency throughout our supply chain. We also take the opportunity to educate our suppliers through the review process via a two layer 'supplier's supplier' model to review and interrogate the modern slavery risks and transparency across their own supply network.

Hearing Australia's supply chain network supports our manufacturing and supply of products and clinical equipment used across our daily operations.

To ensure third party supply of goods and services we may purchase remain compliant with applicable laws, Hearing Australia has established and will continue to develop appropriate processes.

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Modern Slavery Awareness Training

Supplier Training and Information

Our suppliers range from Small to Medium Enterprises (SME's) to Multi-Nationals. Each is required to effectively manage their supply chain risks as a requirement of remaining a Hearing Australia supplier.

In the event a supplier is unaware of their Modern Slavery obligations, we offer and provide information and educational materials within our Supplier Modern Slavery Pack.

Employee Awareness Training

Hearing Australia has an extensive online training programme as well as dedicated learning and development officers to help employees develop their knowledge and professional development.

We are developing dedicated Modern Slavery training modules to raise our employee's awareness of the risks and our obligations under the Act.

Training modules will be distributed annually and mandatory. They will also be provided to all new employees as part of Hearing Australia's onboarding process. Topics covered include:

- Reporting concerns
- Information & resources
- Modern Slavery in Procurement
- Managing Modern Slavery Risks
- Identifying and Assessing Modern Slavery Risks

Reporting Violations

Employees and Suppliers are able to report potential or known Modern Slavery risks, violations or concerns to Hearing Australia's Procurement, Risk and Compliance or Legal functions.

Reported incidents are investigated and if deemed a serious breach, are referred to one of the following federal agencies based on the supplier's headquarters location:

- Australian Federal Police (AFP)
- Australian Border Force (ABF)

17 November 2023



Mr Kim Terrell

Managing Director, Hearing Australia

This statement is made pursuant to Section 13 of the Modern Slavery Act 2018 and was endorsed by the Hearing Australia Board on 17th of November 2023.



Hearing Australia

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