

# Teachers Health Modern Slavery Statement 2025

Under the Modern Slavery Act 2018 (Cth)



**TEACHERS  
HEALTH** 

We're for teachers



## Acknowledgement of Country

Teachers Health Group respectfully acknowledges the Traditional Custodians of this land. We also recognise that Aboriginal and Torres Strait Islander peoples were the first educators and healers and have held the knowledge of this land for many thousands of years. We pay respect to Elders past, present and future, and extend that respect to all Aboriginal and Torres Strait Islander peoples and celebrate their enduring connections to and knowledge of the land, waterways and sky.

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## 1. INTRODUCTION

Modern slavery is a serious global issue affecting around 50 million people. It happens in many industries and countries, and Australia is no exception. In the 2024–25 financial year, the Australian Federal Police received 420 reports of human trafficking and slavery, which was an increase of 10% from the previous year.<sup>1</sup>

Teachers Health is committed to identifying and addressing modern slavery risks in our operations and supply chains. We aim to have a strong, organisation-wide response to this issue.

This is Teachers Health's sixth statement under the *Modern Slavery Act 2018* (Cth). All data in this statement is current as of 30 June 2025, unless noted otherwise. The Board of Teachers Federation Health Ltd (ABN 86 097 030 414) (**Teachers Health**) approved this statement as its governing body on 10 December 2025. Details of the approval and authorised signature are in Annexure 1.

Within Teachers Health, the Modern Slavery Working Group is a cross-functional group that leads our efforts to address modern slavery risks, including the preparation of this statement. During the reporting period, the group met six times. This statement was also reviewed by our Executive Leadership Team.



<sup>1</sup>AFP, Media Release, "Reports of human trafficking nearly double over past five years", 12/10/2025. Available at: <https://www.afp.gov.au/news-centre/media-release/reports-human-trafficking-nearly-double-over-past-five-years> [accessed on 17/10/2025].

## 2. TEACHERS HEALTH'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

This statement covers Teachers Health as the reporting entity. We are an Australian profit-for-member public company that operates for the benefit of our members. Teachers Health is registered as a company limited by guarantee under the *Corporations Act 2001* (Cth) and is a restricted access private health insurer under the *Private Health Insurance Act 2007* (Cth). Teachers Health does not have shareholders.

Our main business activities include:

- Underwriting private health insurance
- Delivering other health services to members
- Managing and investing member funds.

During the reporting period, we provided health cover for 440,315 lives through 199,801 policies under our three brands:

- Teachers Health, for the education community
- Nurses & Midwives Health, for the nursing and midwifery community
- UniHealth, for the higher education community.



### 2.1 Structure and owned /controlled entities

Teachers Health had one wholly owned subsidiary during the reporting period: Teachers Federation Health Foundation Pty Ltd which is the trustee of a charitable trust, the Teachers Health Foundation ('the Foundation'), which gives grants for medical research focused on conditions that affect the health and wellbeing of the teaching, nursing and midwifery communities.

The Foundation's operations and supply chains are closely linked to those of Teachers Health. We consulted with the Foundation when preparing this statement.



## 2.2 Operating locations and key workforce characteristics

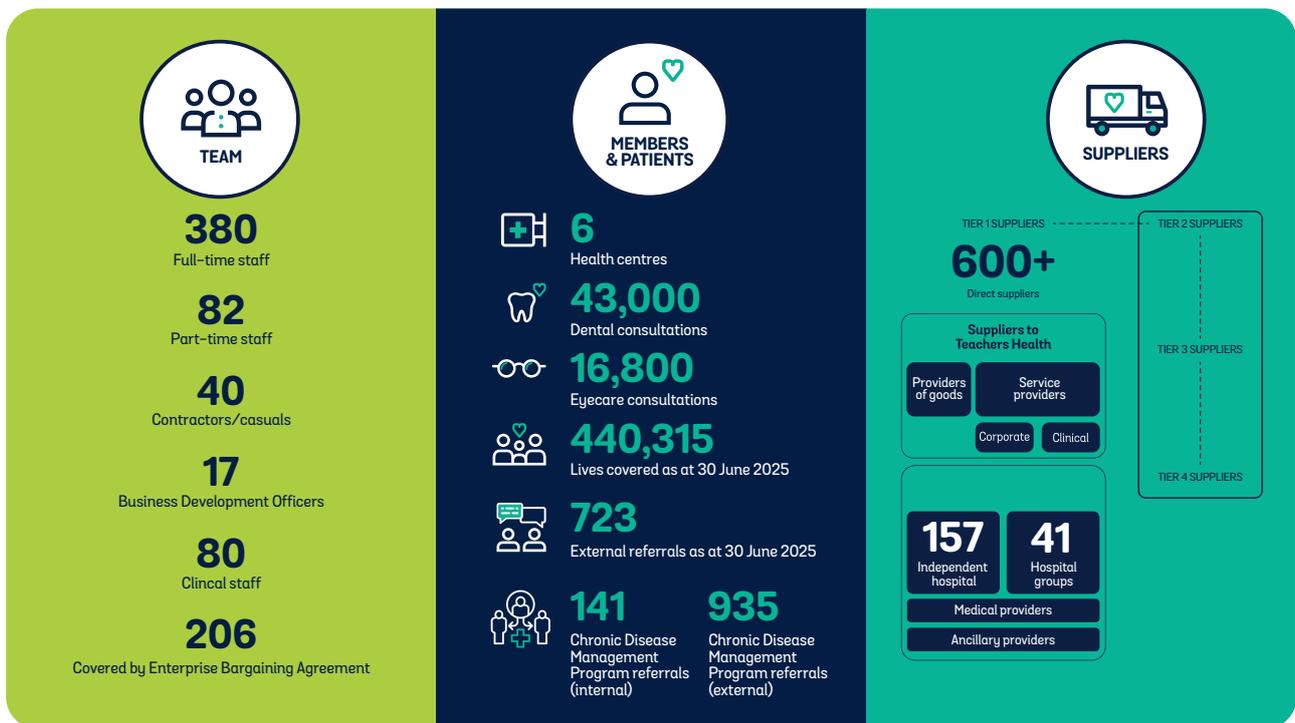
Teachers Health’s registered office is located at Level 4, 260 Elizabeth Street, Sydney. Most of our team works there, with smaller teams at Health Centres in NSW, Victoria and South Australia. Some Business Development Officers work remotely across Australia.

As of 30 June 2025, our workforce included over 490 people across Australia, including:

- 407 full-time employees
- 58 part-time employees
- 30 casual employees
- 17 fixed-term contractors
- 50 independent contractors, mostly at our Health Centres.

We employ our staff and contractors directly, with minimal use of labour hire agencies.

## Teachers Health’s operations and supply chains



## 2.3 Supply chains

During the reporting period, Teachers Health worked with 561 direct suppliers. Most of these suppliers are based in Australia. Over 98% of our total procurement spend was with 272 of these suppliers.

The largest group of suppliers was made up of those supporting our Health Centres (optical, dental and medical), with 81 suppliers. This was followed by 62 technology service providers and 52 corporate service providers (such as office supplies, training and transport).

By expenditure, most of our spending went to technology services (38%), followed by advertising (17%) and consulting services (13%).



**TECHNICAL SERVICES**



**ADVERTISING SERVICES**



**CONSULTING SERVICES**



**CORPORATE SERVICES**



**FINANCIAL SERVICES**



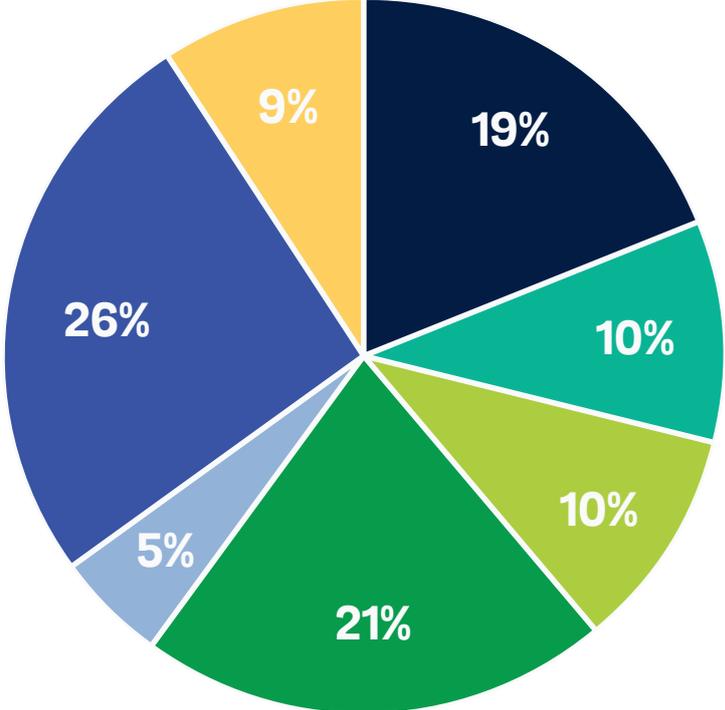
**OPTICAL, DENTAL & MEDICAL SUPPLIERS**



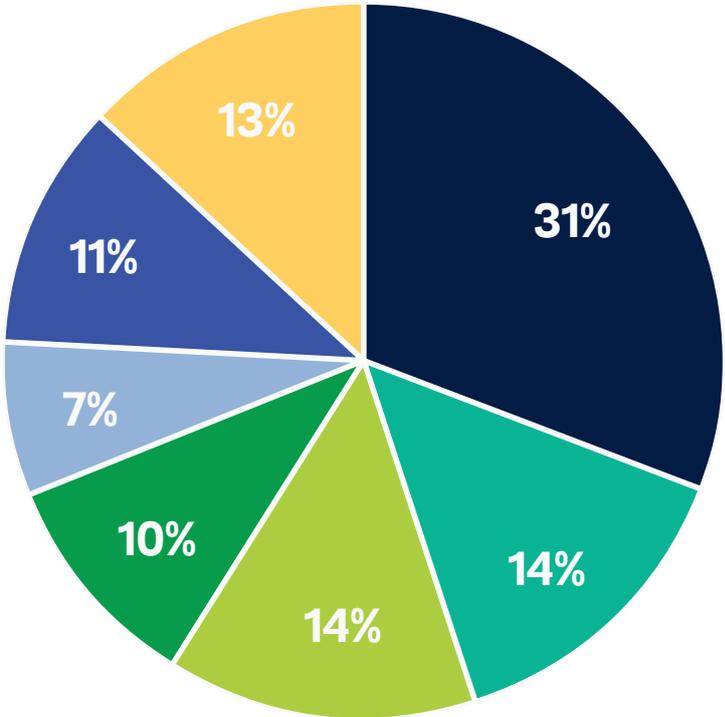
**SERVICES TO BUILDINGS & PROPERTY**

**Supply chain suppliers and spend by category\***

**NUMBER OF SUPPLIERS %**



**% SPEND**



\*Based on direct suppliers with spend over \$10,000 (representing over 98% of total spend) and excluding hospital, medical and ancillary providers.

### 3. IDENTIFYING, ASSESSING AND ADDRESSING MODERN SLAVERY RISK

Teachers Health has assessed our overall modern slavery risk profile to be comparatively low. Key factors contributing to this assessment include the following:

- We are based in Australia
- We operate in a highly regulated industry
- We mostly procure services from other Australian-based companies.

We did not identify any actual or suspected cases of modern slavery in our business operations or supply chains during the reporting period.

#### 3.1 Grievance procedures

Teachers Health maintains a robust governance framework to support ethical behaviour and reduce the risk of modern slavery.

As an employer, we comply with the *Fair Work Act 2009* (Cth), the *Work Health and Safety Act 2011* (Cth) as well as relevant federal and state-based legislation.

Our customer service staff are covered by a triennial Enterprise Agreement approved by the Fair Work Commission, which is valid until 2026. All employees have access to workplace protections such as whistleblower protections, our grievance policy and an employee assistance program.

Teachers Health's whistleblower policy is a key measure to promote transparency and accountability. Embedding awareness and understanding of the policy has been a focus during the reporting period. As of 30 June 2025, 495 employees completed whistleblower training, which represent a 93.57% completion rate. This shows our commitment to helping staff identify and report misconduct, including modern slavery risks.

Our reporting pathways include online, phone, email and post as well as expert advisory services. We use an external provider for our whistleblower and modern slavery reporting processes, which helps to ensure objectivity, independence and continuous improvement.



## 3.2 Internal governance and policy measures

At Teachers Health, everyone shares responsibility for identifying modern slavery risks. However, the ultimate oversight and ownership rests with our Executive Leadership Team and the Board.

We aim to live our HEART values through good corporate citizenship. Addressing modern slavery is part of our broader commitment to sustainability and reducing harm to people, communities, the environment and the economy.

As part of our broader vendor management process, we maintain an internal self-service platform for vendor management that features resources to assist staff to engage with suppliers on modern slavery issues and to negotiate contract clauses relating to modern slavery.

## 3.3 Supply chain risk assessment and due diligence

Teachers Health's supply chain has remained mostly unchanged from a modern slavery perspective since the last reporting period.

Our internal processes help business units choose suppliers who are reputable and suitable for providing goods and services to our members and patients.



### CASE STUDY

#### Supplier due diligence and “deep dive”

During the reporting period, our Modern Slavery Working Group conducted five detailed reviews of selected Tier 1 suppliers. These reviews have been part of our process for the past two years.

##### Process

We use a custom risk assessment framework that includes:

- A Modern Slavery Self-Assessment Questionnaire completed by the supplier
- A review of publicly available information about the supplier's practices.

##### We assess suppliers based on:

- Their compliance with the Modern Slavery Act
- How they identify risks in their own operations and supply chains
- Their governance and oversight of modern slavery risks
- Actions taken to manage and monitor risks
- How they handle incidents and resolve issues.

After reviewing this information, we assess whether the supplier appears to be managing modern slavery risks effectively. If concerns arise, we share them with the relevant relationship manager for follow-up.

##### Findings

The five suppliers reviewed included:

- Two IT vendors
- Two Health Centre suppliers
- One financial services provider.

These industries – especially technology and medical supplies – are considered higher risk due to their complex and global supply.

No major concerns were found during these reviews. The deep dives identified sufficient evidence of modern slavery risk management frameworks within the suppliers for Teachers Health to conclude the modern slavery risk arising from these suppliers was acceptable.

Procurement at Teachers Health is decentralised, meaning business units manage their own supplier relationships. Our legal and risk teams support these units to ensure contracts reflect good practice.

To facilitate this approach, a cross-functional Vendor Management Forum focuses on improving procurement processes. During the reporting period, weekly Vendor Management Clinics were held with legal, risk and information security teams available to support business units with all vendor-related issues, including modern slavery.

### 3.4 Limitations and approach

Teachers Health recognises that desktop reviews have limitations. However, since the highest risks are often found deeper in the supply chain, site visits or worker interviews are not always practical. Instead, we focus on engaging with our direct suppliers via desktop reviews to raise awareness and encourage collaboration.

We recognise that we have less visibility into modern slavery risks for suppliers beyond our direct Tier 1 relationships. Our main strategy is to improve transparency by working with direct suppliers. We also support industry-wide efforts, such as the Private Health Insurance Community of Interest on Modern Slavery (PHI Modern Slavery Col), which promotes collaboration across the sector.

### 3.5 Modern slavery risk assessment

#### Methodology

Teachers Health engages the services of external consultants specialising in modern slavery risk to undertake a high-level risk assessment across our entire supply chain. The assessment uses a balanced, global Multi-Regional Input-Output (MRIO) table to map our supply chain across 208 countries and over 37,000 industry-country combinations. It includes more than 35,000 local industry categories and covers over 98% of global economic activity. The MRIO model is regularly updated using trusted global data sources, including:

- The United Nations (UN) System of National Accounts
- UN COMTRADE databases
- Eurostat databases
- The Institute of Developing Economies
- Japan External Trade Organisation (IDE/JETRO)
- Official statistical data from many national agencies worldwide, including the Australian Bureau of Statistics.

This supply chain data is combined with research on modern slavery risks at national and industry levels. Sources include the Walk Free Foundation's Global Slavery Index (May 2023), the International Labour Organisation's global estimates, US Government reports on child labour and trafficking, and a risk database developed by our consultant.

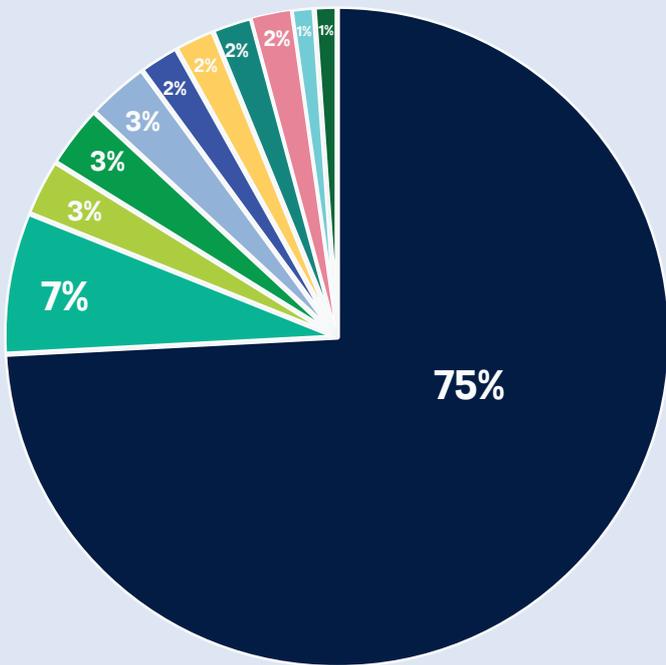
#### Insights for the FY25 reporting period

For this reporting period, areas in our supply chain identified as possibly carrying higher modern slavery risks included:

- Business and professional services
- Health-related services (such as suppliers to our optical and dental centres)
- Uniform providers.

The following diagram highlights the industry categories with potentially higher risks, based on our spend in those sectors and their associated risks.

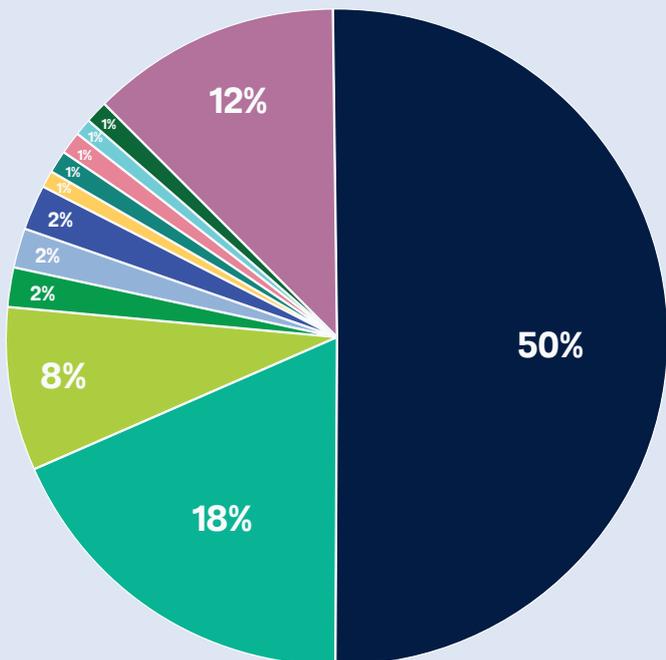
## Allocation of our modern slavery risk exposure by industry



- AUSTRALIA OTHER BUSINESS SERVICES
- INDIA COMPUTER AND RELATED SERVICES
- INDIA TEXTILES
- AUSTRALIA HEALTH AND SOCIAL WORK SERVICES
- AUSTRALIA RETAIL TRADE SERVICES
- AUSTRALIA COMPUTER & RELATED SERVICES
- AUSTRALIA WHOLE TRADE
- AUSTRALIA CONSTRUCTION WORK
- CHINA TEXTILES
- INDIA PRIVATE HOUSEHOLDS
- AUSTRALIA EDUCATION SERVICES

The assessment also indicated that our overall modern slavery risk is highest in Australia, India and China. This is based on how much we spend and the risks linked to our suppliers. While we do not directly work with suppliers in all these countries, our suppliers – or their suppliers – may rely on goods or services from these regions.

## Our modern slavery risk exposure by country



- AUSTRALIA
- INDIA
- CHINA
- INDONESIA
- BANGLADESH
- UNITED STATES
- VIETNAM
- MALAYSIA
- SAUDIA ARABIA
- THAILAND
- PAKISTAN
- OTHER

## 3.6 Supplier engagement

Teachers Health's approach is to focus on engaging with suppliers based on their level of risk.

Together with other members of the Private Health Insurance Community of Interest on Modern Slavery (PHI Modern Slavery CoI), we use a specialist platform provided by an external provider that helps us send targeted Self-Assessment Questionnaires to suppliers and manage their responses.

These questionnaires are issued both as part of the onboarding process for new suppliers, and to existing suppliers that have been identified as higher risk. This approach helps us use resources efficiently and ensures consistency across participating organisations.

During the reporting period:

- 54 suppliers were added to the platform
- 12 suppliers completed the Self-Assessment Questionnaire.

We include **modern slavery clauses** in our supplier contracts that present higher risks of modern slavery. These clauses require suppliers to inform us of any known or suspected modern slavery in their operations or supply chains.

Four suppliers completed **remediation plans** on the platform during the reporting period. These remediation plans involved specific recommendations based on the supplier's response to the questionnaire, as well as links to supporting guidance on that topic. Examples of recommended remediations included:

- Implementing a formal process for identifying modern slavery risks in their own supply chain
- Implementing a corrective action plan for responding to modern slavery or human rights incidents in their supply chain or operations
- Introducing policies to address human rights issues
- Enhancing traceability of their supply chain
- Introducing modern slavery clauses or requirements into their own supplier contracts
- Providing training to employees and/or suppliers around human rights and modern slavery.

We are continuing to develop our guidance material for suppliers on our expectations and approach to modern slavery. These documents are intended to be shared with suppliers during onboarding to support open conversations about modern slavery risks and how to work together for better outcomes.

## 3.7 Hospital, medical and ancillary providers

Teachers Health considers hospitals, medical providers and ancillary providers that provide services to our members to be Tier 1 suppliers. However, our access to these providers is often indirect, either through purchasing groups like the Australian Health Service Alliance (AHSA) and the Australian Regional Health Group (ARHG) or through our members themselves. ARHG has recently updated its agreement with Teachers Health to include modern slavery compliance.

The AHSA's Business Partner Agreement with hospitals includes specific clauses to address modern slavery risks. These clauses require hospitals to:

- Conduct due diligence on their operations and supply chains
- Train staff and contractors to identify and respond to modern slavery risks
- Audit their compliance with modern slavery laws each year
- Notify AHSA of any actual or suspected modern slavery concerns.

We have contracts with more than 295 independent hospitals and 41 hospital groups. Most of these contracts are negotiated by AHSA, which represents 24 private health insurers. We also work with medical providers through ARHG and directly with a small number of providers under our Broader Health Cover offering.

AHSA plays a key role in advancing the PHI Modern Slavery Col's agenda with hospital providers.

For ancillary providers, we believe that industry-wide engagement is the most effective way to address modern slavery risks in this group given the large number of ancillary providers and our relatively low spend with most of them (under \$10,000).

### 3.8 Assessing and managing risk in our investments

Our approach in this area remains consistent with previous reporting periods.

Teachers Health receives advice through a third-party investment advisor who incorporates modern slavery risk issues in its wider Environmental, Social and Governance (ESG) due diligence process in evaluating investment managers and/or investment strategies.

Our investment advisor also:

- Uses third-party data providers to assist with modern slavery risk assessments of its listed equity trusts, including the Select Exclusions Australian Share Trust and the Select Exclusions Global Share Trusts in which Teachers Health is invested
- Applies modern slavery risk analysis results as a basis for engaging with investment managers, including increasing their awareness of the potential modern slavery risk in the supply chains of their investee companies.

### 3.8 Internal training and awareness raising

Teachers Health is committed to increasing awareness of modern slavery across the organisation. All new employees must complete an online training module on commencement, with refresher training every two years. The module is reviewed biennially to ensure the content is up to date. It covers:

- Our legal obligations under the Modern Slavery Act
- What modern slavery is and the different forms it can take
- Risk factors that increase the possibility of modern slavery
- Our corporate responsibilities regarding modern slavery
- The presence of modern slavery in Australia
- How to identify signs of modern slavery
- The importance of transparency in supply chains and operations.

As of 30 June 2025, 609 current and former employees had completed the updated full course, 2023 course, and/or refresher training modules, representing a completion rate of 92.41%.

To build on this, we plan to introduce targeted communications for employees regarding modern slavery. These will focus on specific risks and responsibilities and will be tailored to different roles, including staff, senior leaders and contract owners. This initiative supports our broader ESG strategy and aims to strengthen ethical practices and engagement across the organisation.



## 4. MEASURING EFFECTIVENESS

For transparency, we've compared the actions we planned last year with what we achieved this year. The table below shows our progress:

Planned Action in Teachers Health FY24 Modern Slavery Statement	Level of Delivery in Subject Reporting Period
<p>Development and implementation of our Supplier Code of Conduct, which expresses our expectations of suppliers on ESG topics, including human rights and modern slavery.</p>	<p><b>In progress and under review.</b></p> <p>As of 30 June 2025, internal feedback had been obtained on our Supplier Code of Conduct</p> <p>Work was deferred due to changes in resourcing for ESG management, as well as the merger with Queensland Teachers' Union Health Fund Ltd (TUH) on 1 July 2025. As TUH was also a reporting entity under the Modern Slavery Act, our focus has been on resolving a unified vendor management approach (including modern slavery) for the merged fund.</p>
<p>Development and implementation of Modern Slavery Tool Kit, which is intended to provide a high-level guide to support and educate vendors on our Modern Slavery.</p>	<p><b>In progress and under review.</b></p> <p>As at 30 June 2025, our Modern Slavery Tool Kit is in its final stages of development.</p> <p>Work was deferred due to changes in resourcing for ESG management, as well as the merger with TUH on 1 July 2025. As TUH was also a reporting entity under the Modern Slavery Act, our focus was on resolving a unified vendor management approach (including modern slavery) for the merged fund.</p>
<p>Ongoing supplier engagement and remediation plans.</p>	<p><b>In progress (and ongoing).</b></p> <p>Four suppliers completed remediation plans on the supplier platform during the reporting period.</p>
<p>Future supplier remediation plans, including whether to retain or replace the current approach.</p>	<p><b>In progress and under review.</b></p> <p>We are revising our broader vendor management framework, which is planned to be completed in the next reporting period. As part of this, work is ongoing to develop our approach for future remediation plans, including whether to retain or replace our current approach.</p>

## 5. MODERN SLAVERY ACT 2018 (CTH) STATEMENT ANNEXURE

### Principal governing body approval

This statement was approved by the principal governing body of Teachers Federation Health Ltd ABN 86 097 030 ('Teachers Health') as defined by the Modern Slavery Act 2018 (Cth) ('the Act') on 10 December 2025.

### Signature of responsible member

This modern slavery statement is signed by a responsible member of the Board of Teachers Health as defined by the Act:



### Maree O'Halloran

Chairperson

Teachers Federation Health Ltd

**Mandatory criteria** – Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	5
b) Describe the reporting entity's structure, operations and supply chains.	5-7
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8-13
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8-13
e) Describe how the reporting entity assesses the effectiveness of these actions.	14
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	5
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A

Teachers Health Modern Slavery Statement 2025

Teachers Federation Health Ltd ABN 86 097 030 414. TFH-MSS-11/25.



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