

## 1 INTRODUCTION

InvoCare Limited is an Australian public company with funeral, cemetery and cremation interests in Australia, New Zealand and Singapore.

As a leading provider of funeral and memorial services, InvoCare has a proportionate responsibility to understand, address and step up to resolve the social and ethical challenges associated with our industry. The Board and Executive Leadership Team acknowledge that they are responsible for promoting high standards of ethics and integrity and that their language, attitudes and actions will strongly influence InvoCare's culture.

All our Directors, leaders and employees are expected to act with the utmost integrity in the best interests of the organisation and its stakeholders, while striving at all times to enhance the reputation and performance of InvoCare.

InvoCare recognises the importance of human rights to our employees, shareholders, clients and the communities in which we operate and acknowledges our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices.

The InvoCare Board has identified the need to mitigate the risk of modern slavery within our network and supply chains as a critical area for focus. We recognise that modern slavery risk identification and mitigation is at present an immature process within our organisation and we are committed to developing our processes and adopting a continuous improvement approach.

This statement sets out InvoCare's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no modern slavery within our own business and supply chains.

## 2 OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

This statement covers the activities of InvoCare Limited. In this statement 'InvoCare' means all companies under InvoCare Limited, the key operating entity in Australia being InvoCare Australia Pty Ltd.

Businesses operating under the ownership of InvoCare Limited provide the following products and services:

- Funeral services
- Pre-need services products
- Cemetery, cremation services and memorialisation products
- Pet funeral, cemetery and cremation services

## 3 VENDOR & OUTSOURCING POLICY

The primary risk of modern slavery associated with our operations arises in our supply chains for the products and services that are used in our funeral homes, crematoria and memorial parks.

InvoCare adopts the following principles in evaluating and maintaining an on-going relationship with our suppliers.

Our suppliers must:

- Operate within the law, including relevant public reporting of practices to prevent modern slavery
- Act in a fair, reasonable and ethical manner and manage their third parties in line with these principles
- Respond fully and honestly in relation to any requests for information, including providing reasonable access to relevant documentation and supplier premise
- Act promptly on issues identified by InvoCare, working with InvoCare on any issues identified to rectify and comply with requirements of the Modern Slavery Act.

InvoCare understands that the supply chain for funerals is complex and the assessment of our suppliers may be necessary in our evaluation. InvoCare's due diligence includes:

- Evaluating the modern slavery risks of key new suppliers and high risk suppliers
- Ensuring our contractual arrangements include specific clauses addressing the risk of modern slavery
- Conducting more detailed risk assessments and requesting further information for third and fourth tier suppliers where the risks of slavery and human trafficking are considered to be higher
- Reviewing of potential modern slavery practices as part of our on-going vendor governance processes
- Taking steps to improve any substandard suppliers' practices, including providing advice to suppliers through InvoCare's Procurement Department and requiring them to implement agreed action plans within agreed timelines
- Taking action against suppliers that fail to improve their performance in line with an action plan, including the termination of the business relationship

## 4 RECRUITMENT AND ONBOARDING POLICY

InvoCare uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Once onboarded, InvoCare ensures all staff are appropriately remunerated in line with legal requirements.

## 5 WHISTLE BLOWER

InvoCare encourages all our employees, contractors and suppliers of goods and services to speak up and raise any concerns. In accordance with our Whistleblower policy, we encourage our staff to speak with and raise any concerns with their managers or by using, in confidence, the Whistleblowers Hotline.

## 6 KEY AREAS OF ACTION FOR 2021

- Introduction of the assessment of our key suppliers and suppliers in high-risk regions.
- Training of InvoCare senior leadership, procurement and supply chain employees to detect and identify modern slavery risks
- Undertake assessment of the key suppliers in the InvoCare supply chain.
- Take any steps considered appropriate to assist suppliers in resolving any identified issues.

### Board Approval

This Modern Slavery Statement was approved by the InvoCare Board on 22 February 2021 and will be updated at least annually.



Olivier Chretien  
CEO and Managing Director