

1. Context:

In January 2019 the Australian Government commenced the implementation of the [Modern Slavery Act 2018](#). This requires Government agencies, or companies that administers Government funding, to take reasonable steps to ensure that there is no modern slavery connected to the goods and services they procure. As a business with an annual consolidated revenue of at least \$100 million AUD, KinCare is required to comply with the Modern Slavery Reporting Requirement. This reporting assists KinCare to identify and address our modern slavery risks, and maintain responsible and transparent supply chains. As part of our reporting obligation, we are also required to prepare a Modern Slavery Statement. This statement will set our actions to assess and address modern slavery risks in our business operations and supply chains.

2. Policy Purpose:

Modern Slavery is a crime and violation of human rights and is defined under the [Modern Slavery Act 2018](#) (the Act) as including eight types of serious exploitation:

- Trafficking in persons;
- Slavery;
- Servitude;
- Forced marriage;
- Forced labour;
- Debt bondage;
- Deceptive recruiting for labour or services; and
- the worst forms of child labour, which means situations where children are subjected to slavery or similar practices; or engaged in hazardous work.

The purpose of this policy is to:

- Prevent, detect and respond with mitigating controls to reduce the risk of Modern Slavery occurring within KinCare, its supply chain or in any other business relationships
- Ensure KinCare is compliant with the Act, and which may be amended within legislative requirements
- Demonstrate KinCare's commitment to partnering with businesses and those individuals that comply with the Act.

3. Policy Statement

KinCare is strongly committed to ensuring its contributions to progress human rights within all of its policies and procedures for all of their people, within its supply chain, and any other business stakeholder engagement in relation to modern slavery. KinCare takes and will continue to evolve its meaningful action to identify and address modern slavery within its business operations and governance. KinCare will set a standard of behaviour and values for all employees, supply chain, and any other business relationships, that align with its values, and diversity framework, as required to meet our Aged Care Quality Standards, and the Act.

Related Policies:

Code of Conduct
Purchasing of Goods and Services Policy
Equal Opportunity Policy
Diversity Policy
Approved Provider and Regulatory Compliance Policy
Compliance Policy
Whistleblower Policy

Related Procedures:

Managers Guide to Onboarding and Offboarding Employees
Diversity Procedure
Compliance Procedure

Related Forms:

Vendor Request Form

4. Responsibilities and Delegations:

This policy applies to	All KinCare Employees Supply Chain Vendor/Procurement/Business relationships
Specific responsibilities	Human Resources and Talent Teams - To ensure that onboarding and overarching people policies and practices meet the obligations in mitigating Modern Slavery risks. Compliance and Enterprise Teams - To ensure that our supply chain and vendor partnerships are managed according to KinCare's Modern Slavery obligations.
Roles Responsible for Implementation	Board Members Executive/Senior Leadership Team Members KinCare Leadership Team Members
Roles permitted as a Signature of a Responsible Member	Director Board Member Chief Executive Officer
Approval Body	Board and Executive/Senior Leadership Team
Reporting Period	1 July 2022 to 30 June 2023

5. Definitions:

Employee: means an employee, including a casual employee and contractors of KinCare.

Modern Slavery: as outlined in section 2 'Policy Purpose' of this document.

Modern Slavery Act: means the [Modern Slavery Act 2018](#) and the future amendments to the Act.

Operations: means activities that are directly controlled by KinCare and its divisions/business units.

Responsible Member: means an individual that is appointed as a Director, Board Member or the Chief Executive Officer of KinCare.

Supply Chain: means a business, company, or sole trader that supplies KinCare with goods or services, and includes their officers, directors, subcontractors, agents, related entities and consultants.

Vendor: means a business, company, or sole trader that supplies KinCare with goods or services, and includes their officers, directors, subcontractors, agents, related entities and consultants.

6. Policy & Statement Program:

KinCare ensures that that all reasonable measures are taken to mitigate risks of Modern Slavery with the following measures

(a) Identity of the reporting entity	KinCare Health Services Pty Ltd ABN: 31095961005 Address: Level 4, 20 Lexington Drive, Bella Vista NSW 2153
(b) Description of the structure of, operations and supply chains of the organisation	1. Human Resources - Talent Acquisition. 2. Overseas Contract Manufacturing and Supply Chain from Local Sourcing partners.
(c) Description of the risks of modern slavery practices in the	Human Resources - Talent Acquisition - Risk of directly employing workforce that are at risk of Modern

<p>operations and the supply chains of the reporting entity, and any entities that the reporting entity owns or controls</p>	<p>Slavery as per the Act.</p> <ul style="list-style-type: none"> - Risk of indirect contravention by the use of Talent Acquisition provider. - Risk Assessment Rating: LOW. <p>Overseas Contract Manufacturing and Supply Chain from Local Sourcing partners</p> <ul style="list-style-type: none"> - Risk of direct contravention by the manufacturing partner. - Risk of indirect contravention by a component supplier to our Local Sourcing partners. - Risk Assessment Rating: LOW.
<p>(d) description of the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes</p>	<p>Human Resources - Talent Acquisition</p> <ul style="list-style-type: none"> - The risk of modern slavery in our directly employed workforce is low. This is due to the highly regulated nature of our labour market in Australia, the strict regulation of aged care, the presence of unions to represent employees, and our employees undertaking work in environments where there are established industrial instruments, policies and processes. <p>Overseas Contract Manufacturing and Supply Chain from Local Sourcing partners</p> <ul style="list-style-type: none"> - All vendor agreements have a Modern Slavery clause to ensure that the following compliance requirements are met; <ul style="list-style-type: none"> - adherence to the KinCare Modern Slavery policy - remediation actions including termination and suspension for breach of the Act - providing KinCare the right to audit our vendors and their respective supply chains to review their compliance with the Act. - KinCare requests vendors that are larger spend providers to submit evidence of their Modern Slavery Statements upon request or through our auditing process in alignment with the Aged Care Quality Standards as per Standard 8 - Organisational Governance.
<p>(e) Description of how the reporting entity assesses the effectiveness of such actions</p>	<p>Compliance with the Modern Slavery Act is part of KinCare’s Quality Assurance and auditing requirements, in alignment with the Aged Care Quality Standards as per Standard 8 - Organisational Governance.</p> <p>A vendor review summary will be supplied annually to the Senior Leadership Team and Board to highlight a sample of vendors and supply chain efficacy meeting Modern Slavery compliance.</p> <p>Actions may also include;</p> <ul style="list-style-type: none"> - Termination of vendor and/or supply chain agreements - Changing the choice of vendor and/or supply chain.
<p>(f) Description of how the process with: (ii) any entities that the reporting entities owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14 - the entity giving the statement</p>	<p>KinCare Health Services Pty Ltd does not own any other entities.</p>


(g) Other information	n/a
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7. Escalation and Reporting:

- 7.1 All incidents are to be reported in line with the Incident Management Policy and Procedures and the events escalation framework.
- 7.2 All complaints are to be reported in line with the Complaints Management Policy and Procedures.

8. Reporting Entities Signature of a Responsible Member

This statement is reviewed, considered and approved by KinCare's Board of Directors and signed by Bernadette Gotch in their role as the Chief Executive Officer of KinCare Health Services Pty Ltd on 28 June 2023.

Signature	
Date signed	28/06/2023
Role of Responsible Member	Chief Executive Officer

9. Relevant Legislation:

[Modern Slavery Act 2018](#)

[Aged Care Act 1997](#)

[Aged Care Quality and Safety Commission Act 2018](#)

[Public Governance, Performance and Accountability Act 2013](#)

10. Relevant Standards:

Aged Care Quality Standard 6, 7, and 8.

11. Reference:

Policy Owner:	Chief Human Resources Officer
Authorising Committee:	Senior Leadership Team Quality & Clinical Governance Committee