

Independence Australia Group Ltd.
Modern Slavery Statement
2020/2021

Disclosure Note *This statement has been made on behalf of Independence Australia. This Statement covers all entities owned or controlled by Independence Australia. This statement is approved by Independence Australia's Board of Directors.*

About Us

Independence Australia is a social enterprise that provides choices for people living with a disability or other personal need, enabling them to regain and retain their independence within a supportive community.

We're a national business distributing products to hundreds of thousands of customers all over Australia. Funds generated from the sale of our product of personal health and wellbeing products, mobility aids and equipment support the delivery of essential programs to help enhance the lives of people living with a disability or other personal need.

As a leading supplier of continence aids, wound care, nutrition, skin care, mobility and daily living aids, we understand the complexities and challenges that our customers can face when finding the right solution for them.

We're committed to working collaboratively alongside people with disabilities and older people, their families and carers to plan and provide quality services and products that respond to the person's individual needs, goals, and choices.

Our unique social enterprise approach leverages the sale of health care products to support our core charitable purposes.

Our Values & Guiding Principles

We value equity, integrity, respect, and quality. To demonstrate our commitment to these values, we adhere to the following guiding principles



Customer Centric

Ensuring that customers have choice and control is paramount in our decision making.



Valued People

Encouraging and rewarding innovation and excellence, recognition and feedback.



One Organisation

Sharing a common purpose supported by positive contributions, clear responsibility and accountability.

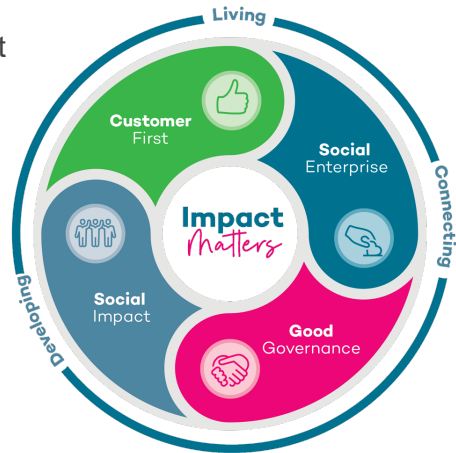


Right First Time

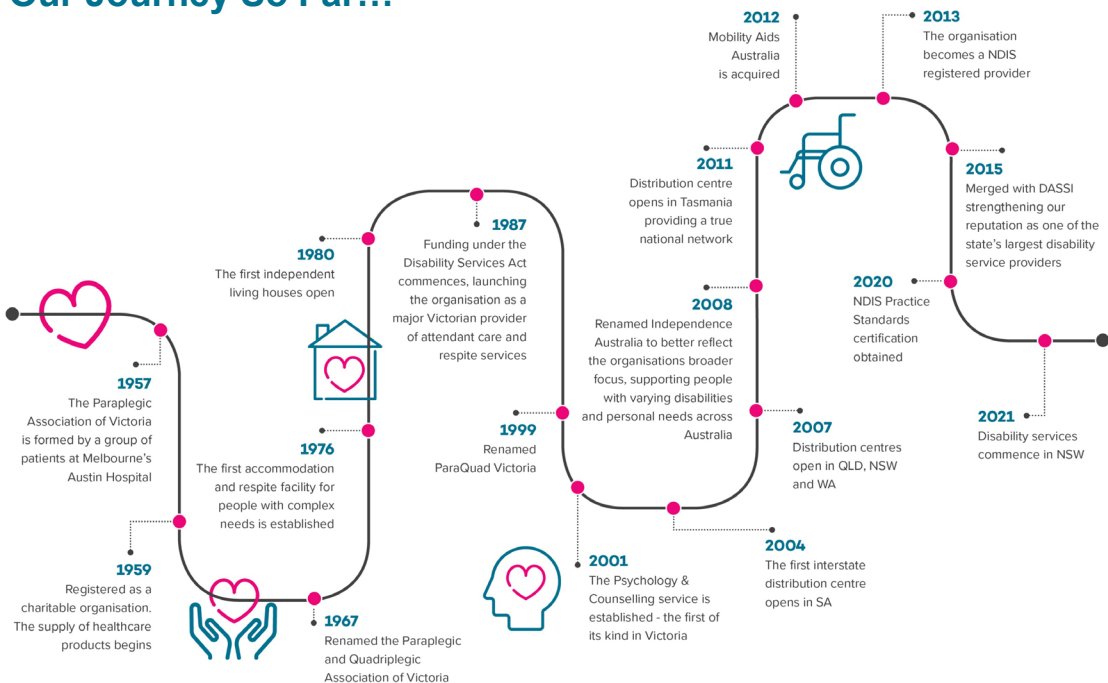
Promoting excellence in everything we do

Strategic Focus

- Putting our **customers first** in everything that we do
- Leveraging our related **social enterprise** capabilities to support our core charitable purpose
- Delivering a sustainable **social impact** that improves the wellbeing of people within the community
- Ensuring **good governance** that guides the organisation to ensure it delivers on its core purpose



Our Journey So Far...



What is Modern Slavery?

Modern Slavery is conduct that contravenes basic human rights and is characterised by one or more of the following:

People trafficking	Describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.
Slavery	Describes situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
Debt bondage	Describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
Servitude	Describes situations where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.
Forced labour	Describes situations where the victim is either not free to stop working or not free to leave their place of work.
Forced marriage	Describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
Deceptive recruiting for labour services	Describes situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
Worst forms of child labour	Describes situations where children are: <ul style="list-style-type: none">• exploited through slavery or similar practices, including for sexual exploitation; or• engaged in hazardous work which may harm their health, safety or morals; or• used to produce or traffic drugs.

1. Reporting Criteria

1.1 The Reporting Entity

Independence Australia Group Ltd.

1.2 Structure, Operations & Supply Chain

Independence Australia Group Ltd (ACN: 004 979 837) is a public company, limited by guarantee, registered with the Australian Charities and Not-for-profits Commission (ACNC).

Independence Australia’s governance arrangements are outlined in our Constitution. All members of the organisation are required to meet the standards as set out in our Code of Conduct.

The Board’s structure is described below with several responsibilities delegated to the Executive Team. The Board is also supported by Board sub-committees, which comprise members of the Board and Executive Team and are set out below:



Our Operations

Independence Australia Group operates the following businesses and services:

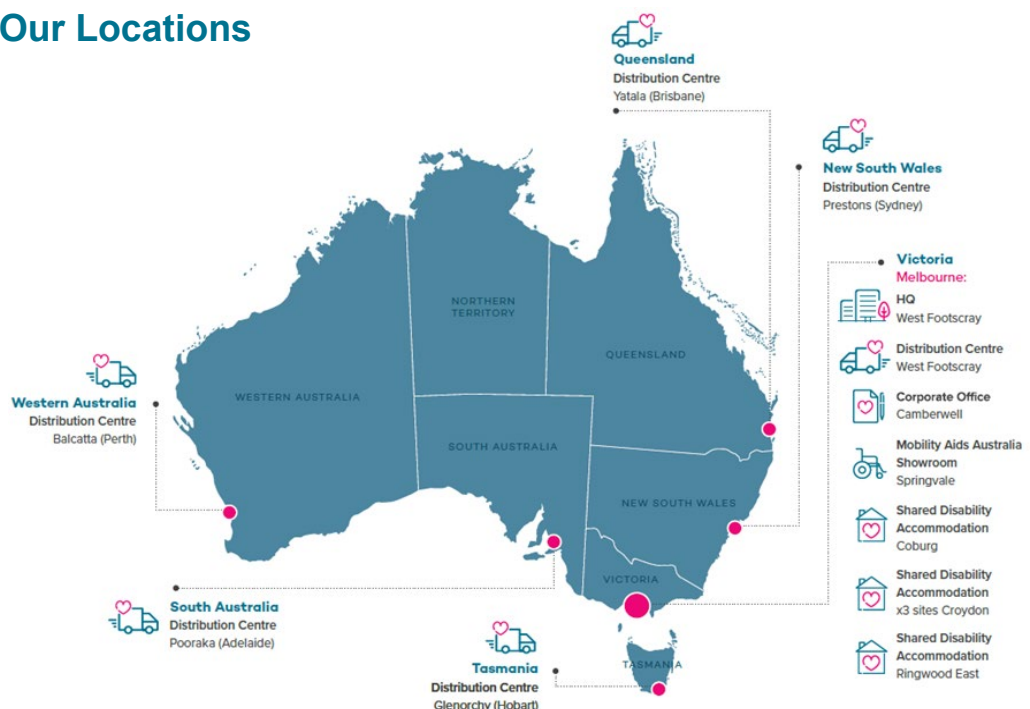
Disability Services (Victoria)

- In-Home supports to over 450 clients
- Shared Supported Accommodation across 5 residential homes
- Complex Care - supporting clients with high needs and customised service options
- Support Coordination - a capacity building support to implement all supports in a participant's NDIS plan, including informal, mainstream, community and funded supports
- Psychology & Counselling – our specialist service assists clients adjust to spinal injury and/or acquired brain injury
- Support Groups – content varies based on demand but can include groups supporting Grief and Loss and peer support for people living with disability
- SpinChat - our TAC sponsored SpinChat program raises awareness, promotes prevention, and educates secondary school students about spinal cord injury

Social Enterprise

- National supplier of medical and healthcare products including continence, wound care, daily living aids, nutrition, skin care
- Mobility Aids Australia - a leading supplier of mobility aids and assistive technology products

Our Locations



Our Supply Chains

We purchase goods and services from a broad range of manufacturers, suppliers and service providers. These include:

Products

- Our comprehensive catalogue of medical and healthcare products that include continence, wound care, daily living aids, nutrition and skin care items
- A broad range Mobility Aids and assistive technology – scooters, wheelchairs, beds, seating, walking aids, bathroom & toilet aids, living aids, lifters & ramps
- Supplies necessary for the operation of the businesses

Services

- Uses agency staff periodically for staff backfill
- Freight and courier services for deliveries to customers
- Technology software, services, and support
- Property
- Facilities including utilities, telecommunication, cleaning, building, waste, fleet and related services
- A broad range of corporate, advisory and specialist services
- Other services necessary for the operation of the business

Our supply chain is managed in compliance with our corporate governance framework and aligned with our delegations.

1.3 Risks of modern slavery practices in the operations and supply chains

Operational Risks

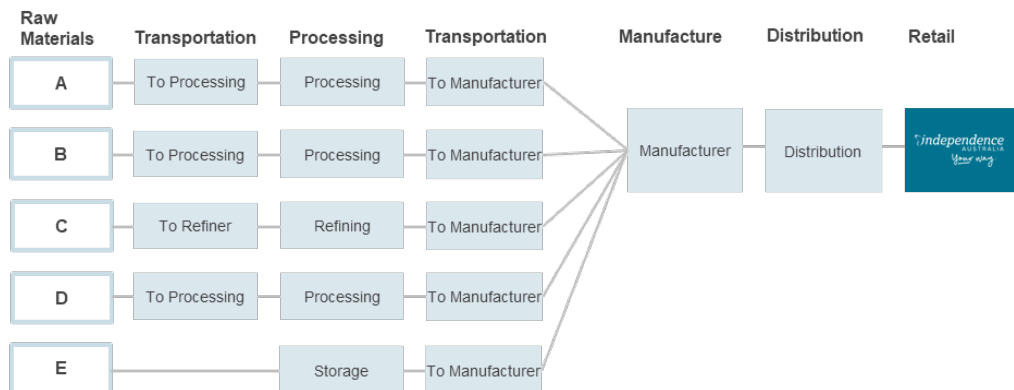
Independence Australia is reliant on our suppliers for product information and its source, we adopt their policies and procedures to address modern slavery in our operations and supply chains. We work with our supply partners to respect and promote human rights.

Supply Chain Risks

The chart below details the generic process for sourcing our product range

which includes continence pads, wound care, nutritional supplements, and various aids.

At any stage along the way, risks may present for people to be subject to forms of modern slavery and exploitation.



1.4 Actions taken to assess and address those risks

A number of measures have been developed to mitigate supply chain risks:

- All suppliers will be made aware that all forms of modern slavery are unacceptable to Independence Australia.
- We will assess our supply chains to identify risks of modern slavery.
- New suppliers are required to comply with our Supplier Code of Conduct.
- Non-compliance with our Supplier Code of Conduct will be regarded as a material breach of any agreement and deemed sufficient cause for terminating the agreement.

Other Measures:

- Policies and procedures: A modern slavery policy has been adopted.
- Safe reporting: all staff are encouraged to report modern slavery. Any reports will be through our existing reporting process.
- Training: General awareness training will be made available to all staff with the roll out of the Human Capital Management System and the associated Learning Management System. This training will be mandatory for all staff involved with procurement and contract management.
- Regular review: Risk assessment processes and actions taken to address

modern slavery are monitored and reviewed regularly

- Business Metrics: Performance against our annual plan will be reviewed to assess effectiveness
- Other initiatives: We are evaluating initiatives from industry bodies, our auditor (KPMG), key suppliers, etc. to ensure that our approach remains contemporary and appropriate to the IA context.

Progress in 2020/21

- Our procurement team completed modern slavery training via our new Learning Management System (LMS) platform. Other staff may complete this training on a voluntary basis;
- Drafted our Supplier Code of Conduct which requires our suppliers to actively manage the risks of modern slavery in their supply chain;
- A review of our largest suppliers (high-volume) has commenced to evaluate modern slavery risks in our supply chain; and
- Actively monitor intelligence, industry/media reports, country of origin, type of product for modern slavery conduct.

Our Plans for 2021/22

- Roll-out our Supplier Code of Conduct which requires suppliers to actively manage the risks of modern slavery in their supply chain;
- Finalise the review of our largest (high-volume) suppliers to have them describe how they can provide assurance in mitigating modern slavery risks in their supply chains; and
- Continue to actively monitor intelligence, industry/media reports, country of origin, type of product for conduct that is indicative of modern slavery.

1.5 Assessing the effectiveness of modern slavery measures

Our modern slavery risk management strategy will be reviewed periodically to assess its effectiveness. Our risk assessment procedure requires annual review of all risks and controls, including modern slavery risks identified in our operations and supply chain.

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate risks of modern slavery in our operations and supply chain. For this reporting period we have undertaken the actions as described above.

- Engage senior management team
- Inform wider organisation of Independence Australia's direction.

1.5 Processes of consultation with entities owned or controlled

Independence Australia has a subsidiary company in which its key personnel are directors are subject to the policies and procedures of the parent entity.

1.6 Any other relevant information

Nil.

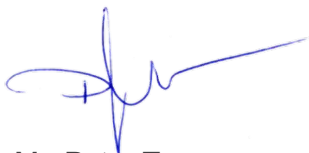
Recommendation by the Board of Independence Australia Group Ltd.

This Modern Slavery Statement is unanimously endorsed and adopted by the Board of Directors and approved for submission to the Australian Border Force Online Register for Modern Slavery Statements.

Signed,



Mr. Brian Meltzer
Chairman, Independence Australia Group Ltd.



Mr. Peter Turner
Managing Director & CEO, Independence Australia Group Ltd.

23 November 2021

References

Legislation

- *Modern Slavery Act 2018* (Cth)

Websites

- Modern Slavery Register - <https://modernslaveryregister.gov.au/>
- Anti-Slavery International - www.antislavery.org

Guides

- Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities (ABF Business Engagement Unit)

Ethical Sourcing and Modern Slavery Policy

1. Policy Statement

- a) Independence Australia will as far as practical:
 - i) adopt policies and procedures to address modern slavery in our operations and supply chains;
 - ii) include in our operational and supplier contract terms, requirements that suppliers will comply with all local, national and other applicable laws and regulations in the areas in which they operate;
 - iii) use in our operational and supplier contract terms requirements that suppliers:
 - (1) comply with the Minimum Standards set out in Annexure A; and
 - (2) support our respective businesses achieve those Standards including rights of termination if a supplier is unable or unwilling to work towards full compliance with our Minimum Standards.
- b) As far as practicable, suppliers must be:
 - i) encouraged to exceed the Minimum Standards, and promote best practice and continuous improvement; and
 - ii) monitored for compliance with the Minimum Standards through supplier assessment processes as appropriate, taking into account all relevant risk factors such as country risk and product risk.
- c) monitor and review the effectiveness of the policies and procedures referred to in paragraph i) above, taking into account their suitability, adequacy and effectiveness as per the risk assessment.

2. Purpose

The **Modern Slavery Act 2018 (Cth)** took effect on 1 January 2019 and requires Independence Australia Group to prepare annual statements covering the entity's reporting period (financial year) for the first full reporting period after 1 January 2019 and submit a reporting entity statement to the Australian Border Force within six months of the end of the reporting period.

We recognise the important role we play in respecting and promoting human rights and eradicating modern slavery. We recognise that modern slavery is a growing and complex problem, best tackled by collective commitment and responsibility to bring it to an end and we will work with our stakeholders to fulfil this common goal.

The purpose of this Policy is to ensure that Independence Australia Group:

- a) is compliant with local, national and other applicable laws and regulations in the areas in which its businesses operate;
- b) sources products and services in accordance with legal obligations and community expectations while working with suppliers to improve their social and environmental practices;
- c) acts to prevent, mitigate, and where appropriate, remedy modern slavery in its operations and supply chains.

3. Scope

This policy applies to the whole of organisation and is managed by the Procurement Department. The Finance Department will oversee the reporting and submission requirements.

4. Principles

What are the values and beliefs behind the policy position?

Accountability for modern slavery issues, with an identified risk owner	We will ensure that our relevant teams are accountable for addressing modern slavery issues in operations and supplier contracts and will nominate a specified individual or role to be responsible for overseeing management of this risk.
Supply chain mapping and risk assessment	We will assess the risks of modern slavery across our operations. The risk assessment must initially address the modern slavery risks of suppliers (operations/manufacturing outside of Australia in countries with identified recent cases) and those deemed to be of high risk.
On-boarding and contracting	We will undertake due diligence on current and new suppliers in a phased approach to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate for its business. We will consider the supplier's ethical sourcing and modern slavery performance as part of supplier on-boarding ensuring their compliance with the Minimum Standards set out in Annexure A.
Audit and compliance program	We will assess suppliers through their audit/compliance program to confirm compliance with this policy. This may include desktop audits and interviewing supplier staff on their practices.
Training	The Executive, Procurement, Quality & Safeguarding, Marketing and other relevant roles will receive training on the policy and processes applicable to their role.
Complaints mechanism	We will establish a reporting mechanism (via the ionMy platform) for reporting modern slavery issues which allows for confidential and anonymous reporting and provides protection from reprisal. Complaints will be investigated and reported through to the Executive.
Remediation	We will work with suppliers/providers to remediate any breaches of this policy.
Stakeholder engagement	We will engage with stakeholders on modern slavery & ethical sourcing issues.
Review	We will monitor and annually review the effectiveness of the risk management measures described above.

5. Definitions

Modern Slavery	Conduct which would constitute: (a) an offence under Division 270 or 271 of the Criminal Code; or (b) an offence under either of those Divisions if the conduct took place in Australia; or
-----------------------	---

	<p>(c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or</p> <p>(d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).</p>
Supply Chains	The products and services (including labour) that contribute to the entity's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

6. Related policy and procedures

- Independence Australia Code of Conduct
- Protected Disclosures (Whistleblower) Policy

7. Related legislation and policy and reference

- Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities
- *Modern Slavery Act 2018* (Cth)
- *Criminal Code Act 1995* (Cth)
- *Modern Slavery Act 2018* (NSW)
- PricewaterhouseCoopers (PwC) Modern Slavery Reporting in Australia
- Wesfarmers Ethical Sourcing and Modern Slavery Policy

8. Approvals

Independence Australia Executive.

Reviewed By:	Position: Executive Board Members
Approved By:	Position: Executive Board Members

Annexure A - Minimum Standards Expected of Suppliers

<p>No forced or bonded labour</p>	<p>Employment shall be freely chosen. Suppliers shall:</p> <ul style="list-style-type: none"> (a) not use any type of forced labour (any work or service extracted from any person under the menace of any penalty, which work has not been freely chosen by the person), bonded labour (work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange) or indentured labour (in which an employer forbids workers from leaving employment at the worker's discretion); (b) respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits or taking any other action to prevent workers from terminating their employment; and <p>ensure that workers are free to leave their employer after reasonable notice.</p>
<p>No child labour</p>	<p>Suppliers shall comply with the minimum legal working age in the country in question or in the absence of such law, by the International Labour Organisation (ILO) Convention 138. Suppliers must be able to verify the age of all employees to ensure compliance. Suppliers must accept the principles of remediation⁶ of child and under age workers, and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.</p>
<p>Wages, benefits, and transparent record keeping</p>	<p>Suppliers must at a minimum comply with all laws regulating local wages, overtime compensation and legally mandated benefits. Record keeping must be accurate and transparent. Workers must be provided with written and understandable information about their employment conditions before they enter employment and about their wages for each pay period. Deductions from wages for disciplinary measures or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned. All disciplinary measures should be recorded.</p>
<p>Working hours</p>	<p>Working hours must comply with applicable local laws. Workers should not be required to work more than the maximum hours per week as stipulated by local laws or in the absence of such law by the applicable ILO convention. Overtime shall be agreed, shall not be excessive, shall not be requested on a regular basis and shall be compensated as prescribed by applicable local laws.</p>
<p>No discrimination</p>	<p>All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation. Suppliers must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.</p>
<p>No harassment or</p>	<p>Workers shall be treated with dignity and respect. In particular, suppliers</p>

abuse	will provide a workplace free from harassment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.
Freedom of association, grievance mechanisms and recourse	<p>Suppliers shall respect the rights of workers to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country of operation. Workers should have the right to join or form trade unions of their choosing. Suppliers should not interfere with, obstruct or prevent legitimate related activities, such as collective bargaining. Workers are allowed to select worker representatives. Representatives should not be discriminated against and should have regular access to company management or appropriate process in order to address grievances and other issues.</p> <p>Suppliers must have a policy in place for workers to approach management on issues of concern, on their own or through worker representatives, confidentially.</p>
Working conditions	Suppliers shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied, and workers trained in their use. Where suppliers provide accommodation it shall be clean, safe and meet the basic needs of workers. Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Workers have the right to refuse work that is unsafe.
No bribery	Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise. Suppliers shall keep accurate records of all payments made and received in cash or in kind, for audit purposes.
Sub-contracting	Where sub-contracting is permitted, suppliers must have adequate processes in place for properly managing sub-contracting to ensure that sub- contractors operate in accordance with this and any applicable divisional/business unit policy, and is undertaken strictly in accordance with the contract.
Environmental compliance	Suppliers shall comply with relevant local and national environmental protection laws and will as far as practicably comply with international environmental protection standards.
Animal welfare	Suppliers must ensure animals are treated humanely and with respect.
Migrant workers	Migrant workers shall have the same entitlements as local workers as stipulated by local law. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the worker to surrender identification documents. Workers employed through a third-party agent or contractors are the responsibility of the suppliers and are thus covered by these Minimum Standards.

<p>Hiring and regular employment</p>	<p>Suppliers must provide each worker with a clear, understandable labour contract containing all legally required employment terms, entitlements and conditions. In addition, where possible, suppliers should work towards providing permanent employment for workers and avoid labour-only contracting arrangements, consecutive short-term contracts, excessive piece-work or false apprenticeship schemes to avoid obligations of regular employment to workers.</p>
--------------------------------------	---