



MODERN SLAVERY STATEMENT

DISCLOSURE NOTE

This statement has been made on behalf of the genU Group consisting of the reporting entity Karingal St Laurence Limited ACN 614 366 031 and all entities owned or controlled by Karingal St Laurence Limited for the financial year 1 July 2019 to 30 June 2020.

This statement is approved by Karingal St Laurence Limited's Board of Directors.

A handwritten signature in black ink, appearing to read 'Stephen Roberts', written over a light blue horizontal line.

Stephen Roberts
Karingal St Laurence Limited Chair

Dated: 3 February 2021

This is the genU Group's first Modern Slavery Statement, which outlines the steps we have taken to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain.

ABOUT US

genU is a not-for-profit human services organisation and respects the human rights of our clients, employees, and every worker in our supply chain.

OUR VISION: To build inclusive communities.

OUR MISSION: To create and deliver innovative services and supports that empower people to reach their full potential.

OUR VALUES: Welcoming, respectful, courageous, excellence, integrity.

WHAT IS MODERN SLAVERY?

Modern slavery is a growing global and systemic issue that involves situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception and/or abuse of power.

genU (and its subsidiaries) are subject to the Modern Slavery Act 2018 (Cth) (the 'Act') that commenced operation on 1 January 2019. The Act requires certain entities to report on the risks of modern slavery in their operations and supply chains and to detail actions to address those risks. genU had an annual consolidated revenue of at least \$100 million over the twelve-month reporting period and was an Australian entity during that reporting period and is therefore a reporting entity for the purposes of the Act.

genU is committed to operating our business lawfully, creating a more sustainable supply chain and ensuring ethical practices. As such, we are extremely supportive of the Act along with the United Nations Guiding Principles on Business and Human Rights and are working closely with our suppliers and partners to ensure full compliance with the Act.

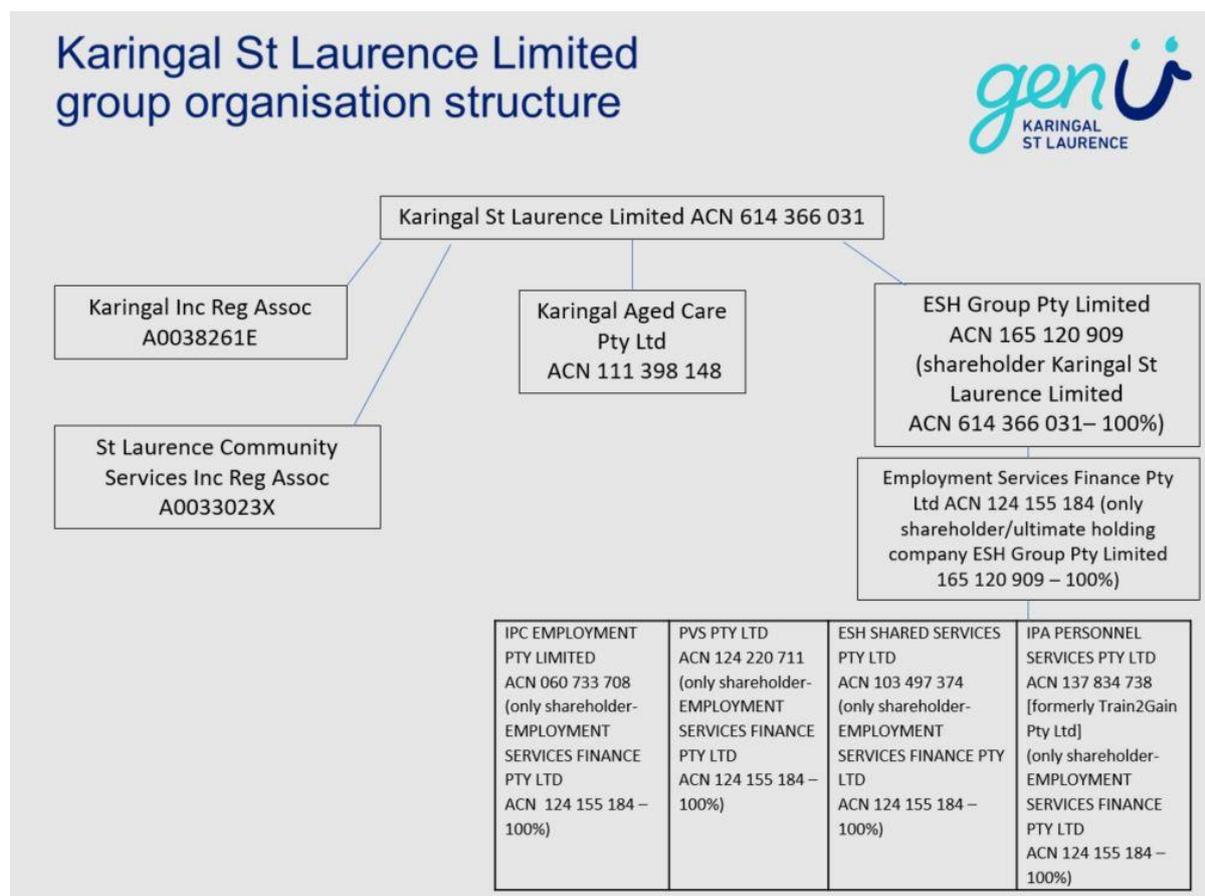
OUR STRUCTURE

Karingal St Laurence Limited ACN 614 366 031 is a public company limited by guarantee, is registered with the Australian Charities and Not for Profits Commission (ACNC) and conducts its business under various registered trademarks and business names including genU and MatchWorks throughout Australia. The reporting entity's registered office is located at 21-29 Reynolds Road, Highton, Victoria.

We have 3261 employees and provide disability, aged care, training, employment, recruitment, labour hire, childcare, social housing, and retirement living services.

Our wholly owned subsidiary ESH Group Pty Ltd ACN 165 120 909 heads up a corporate structure that includes five entities, one of which was operational during the reporting period being IPA Personnel Services Pty Ltd ACN 137 834 738, a proprietary limited company that provides recruitment and labour hire services nationally. IPA has 70 FTE employees and 1,450 labour hire employees that are supplied by IPA to various corporate organisations throughout Australia.

We have the following organisational structure in place:



It should be noted that Karingal Inc, St Laurence Community Services Inc, Karingal Aged Care Pty Ltd, Employment Services Finance Pty Ltd, IPC Employment Pty Ltd, PVS Pty Ltd and ESH Shared Services Pty Ltd were not operational and did not procure goods and services during the reporting period.

OUR GOVERNANCE FRAMEWORK

We have a strong and robust governance framework which underpins everything we do.

Our governance arrangements are set out in our Constitution and all our Directors, Executive Leadership Team and employees are required to meet the standards of conduct and behaviour that are set out in our Code of Conduct.

The Board’s role and responsibilities are set out in the Board Charter. There is a certain Delegations framework in place with certain responsibilities delegated to the Executive Leadership Team. The Board is supported by the following subcommittees of the Board: Finance, People & Culture and Risk, Client Experience and Clinical Governance.

OUR OPERATIONS

GenU services are centred around people with disability, their carers, students job seekers, employers, and older Australians.

genU delivers services through its various operational divisions and branches including genU Ability, Aged Care, Employment Services, Recruitment and Training, Retirement Living and Childcare.

DISABILITY AND AGED CARE

genU empowers you to be the best you that you can be! We offer a range of supports under our disability and aged care services.

These services include:

- Support coordination – includes assistance with organising supports and achieving goals.
- set out in NDIS plans, case management, and the provision of Home Care Packages (HCP) to help older people live at home longer.
- Individual support – for maintaining independence and reaching goals.
- Living options – including Supported Independent Living (SIL) and Specialist Disability Accommodation (SDA) for people with disability, respite accommodation, aged care facilities and retirement living.
- Recreation activities – from community groups, day programs and adventure activities.
- Employment support services – skill building, placements, and opportunities for employment in a supported environment at genU Business Enterprises.

TRAINING

genU Training is a registered training organisation which puts high quality learning within everybody's reach. GenU Training gets people job-ready by offering accredited training, nationally recognised qualifications, and vocational short courses.

EMPLOYMENT

No matter your background, age, or ability, MatchWorks will find the best employment solution for you as a job seeker. We offer employment solutions through the jobactive program and Disability Employment Services (DES). As one of the largest employment service providers in Australia, MatchWorks also supports employers to create diverse and inclusive workplaces.

RECRUITMENT

IPA Recruitment Services specialises in recruitment and labour hire. IPA provides a diversified revenue stream for genU, with profits from the business reinvested back into genU services.

CHILDCARE

Pipsqueaks Early Learning Centre is a purpose-built childcare centre. Pipsqueaks offers a high-quality education service and childcare in Lara from nursery to pre-school age, including a three- and four-year-old kindergarten program.

OUR SUPPLY CHAIN

genU transacted with 6,719 individual suppliers during the reporting period, with a total procurement spend of \$70m.

We procure across 21 broad categories:

Building construction	Property maintenance	Cleaning and Sanitary
Medical continence and PPE	Non-medical PPE	Uniforms and workwear
Utilities	Marketing and promotions	Waste
Office supplies	Fleet	Food
Insurance	Office furniture	ICT equipment and software
Recruitment and training	Postage	Security
Workcover	Salary Packaging	Travel
Mobile and data		

We have identified that 70% of our procurement expenditure is directed towards 15% of our suppliers and in the following categories:

ICT equipment and software	Fleet	Office supplies
Mobile and data	Security	Cleaning and sanitary
Utilities	Waste management	Property maintenance

One of the key objectives of genU’s Procurement Optimisation Program is to continue work to consolidate our supply chain. We recognise that currently 30% of our spend is directed towards 85% of our suppliers and we will obtain both cost efficiencies and be better placed to manage supply chain risk including modern slavery compliance through this process of consolidation.

MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

On consolidating supplier response to our supply chain review, genU profiled each supplier by commodity and industry to establish a baseline of risk.

According to the 2018 Global Slavery Index, the biggest industry risks in Australia are:

- ICT equipment, including mobile phones and,
- Garments.

Based on our spend profile, genU is particularly exposed to the risks associated with ICT equipment as it is the second largest category, accounting for 14% of total spend. genU is also aware of the risks associated with procuring clothing and footwear for jobseekers and labour hire employees.

Other industries in our supply chain that are susceptible to modern slavery include:

- Food processing
- Construction
- Industrial cleaning

In respect to commodity risks, documented high risks products include coffee, tea, sugar, rubber, textiles, furniture, carpet, bananas, and timber. In addition to the above industries, other categories that expose genU to modern slavery risks include:

- Office supplies
- Property maintenance
- Office furniture

ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

2019/20 modern slavery risk management initiatives.

- Commenced a review of our supply chain to establish a risk profile of our suppliers and process to manage modern slavery risk at genU.
- Established a Procurement Optimisation Program. For the year 2020_21, genU Procurement's strategy focused on developing a framework that maximised value for money whilst ensuring transparency, consistency, and accountability. The main areas of focus were:
 1. Enhancing policies and procedures and supporting documents
 2. Redefining the role of procurement and designing an appropriate structure and resources
 3. Training and education for staff
 4. Reporting and monitoring
 5. Strengthening internal controls
- Updated our Code of Conduct setting out our expectations of our suppliers around human rights, labour rights, violence against women, and rights of children.
- Introduced supplier on-boarding practices and developed vendor questionnaires so that we are aware of the modern slavery risks in our supply chain and can begin to work with suppliers in reducing those risks.
- Updated our supplier contracts and where relevant, reviewed contracts with suppliers to ensure they contain terms that are consistent with the Act.
- Developed in-house training for our staff in modern slavery requirements.
- Updated our Whistleblower and Fraud & Corruption Policies to ensure compliance with the Act so as to provide grievance mechanisms for concerns to be raised and addressed.
- Set out a plan for year 2 to continue to address any possible modern slavery risks that may be identified within our supply chain and to monitor effectiveness of our actions.

EFFECTIVENESS ASSESSMENT

The assessment of modern slavery risk is now built into our due diligence and risk management processes. On the completion of our review and supplier profiling, the following agreed actions form the next phase of enhancing the framework for the ongoing monitoring and management of the risks associated with modern slavery:

- Develop a Supplier Code of Conduct
- Nomination of genU Procurement as lead function in managing our legislated obligations.
- Review the capabilities of genU's Financial Management system to assist in developing reporting and monitor tools.
- Enhanced Contract Management

In Year 2 2020/21 we will:

- Establish a process for regular management review of the actions taken by establishment of an internal committee.
- Provide quarterly updates to our Board Risk Committee on the risk of modern slavery in our supply chain and actions taken to mitigate those risks.
- Continue to carry out appropriate due diligence as part of our RFT processes and ensure that modern slavery clauses are incorporated into new supplier contracts.
- Continue with our training of employees in modern slavery.
- Monitor reporting through grievance mechanisms to assess trends and ensure appropriate management of reported issues.
- Develop and continue to implement strategies to reduce modern slavery risks in our supply chain including working with our existing suppliers to check how they are progressing with their actions.
- Conduct internal quality audits to ensure compliance with our processes.

PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

The genU group is governed and managed by the same Board, Chief Executive Officer and Executive Leadership Team and as a result, all entities owned or controlled have been fully included in the process of consultation.

OTHER RELEVANT INFORMATION

genU is committed to upholding the international human rights treaties to which Australia is part. This includes (but is not limited to) complying with the UN Convention on Rights of Persons with Disabilities, UN Convention on the Rights of the Child, UN Resolution on Protection Against Violence and Discrimination Based on Sexual Orientation and Gender Identity and the UN declaration of Human Rights.