

MODERN SLAVERY STATEMENT

2024-2025

genü

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In the spirit of reconciliation, genU acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea, and community.

We pay our respect to their Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander peoples.

We are proud to continue our reconciliation journey through the genU Innovate Reconciliation Action Plan.

Artwork copyright Chris Delamont, Wirandjuri/Nari Nari, Riverina, Balnuruwanha 'Take Flight', 2022.



INTRODUCTION

Karingal St Laurence Limited (ACN 614 366 031) ('genU') has developed this Modern Slavery Statement ('The Statement') in line with the Modern Slavery Act (2018) requirements ('The Act').

genU does not tolerate modern slavery within our business or supply chains in any form. We are committed to implementing effective systems and controls to ensure that modern slavery and human trafficking do not occur in our own business or in those business' that supply genU.

This statement explains the actions we have taken to prevent, identify, and manage risks related to modern slavery across our business and throughout our supply chains during the reporting period 1 July 2024 to 30 June 2025.

It was approved by the Board of Directors, Karingal St Laurence Limited (genU) on 9 December 2025, and is signed by Clare Amies in her role as the CEO of Karingal St Laurence Limited (genU).



Clare Amies
genU Chief Executive Officer

WHO WE ARE

For more than 70 years, genU has been an intrinsic part of our local communities.

genU helps people of all ages and abilities to find jobs, homes, training, support and assistance to lead a fulfilling life, based on their individual circumstances and needs.

Today, genU provides support and services to around 48,900 people a year through our core disability, ageing, training and employment services. We have more than 4,900 staff across Australia.

genU continues to seek opportunities to extend our reach and improve our services to enrich the lives of more Australians, and to grow our positive impact through everything we do.

As a profit-for-purpose organisation, we're committed to reinvesting our surpluses into services that build inclusive communities.

OUR VISION

Genuinely inclusive communities

OUR PURPOSE

Enriching lives through connections, supports and opportunities

OUR VALUES



WELCOMING



INNOVATIVE



SAFE



EMPOWERED



RESPECTFUL

REPORTING STRUCTURE AND ORGANISATION

genU (Karingal St Laurence Limited – ACN 614 366 031, ABN 74 614 366 031) is an Australian not-for-profit organisation that provides disability, aged care, training, employment, and community services across Australia. genU was formed through the merger of Karingal and St Laurence in 2016 and continues to operate as a public company limited by guarantee.

References to genU in this statement relate to the consolidated operations of Karingal St Laurence Limited and its controlled entities, including Activ Foundation Limited, IPA Personnel Services Pty Ltd, Karingal Aged Care Pty Ltd, and St Laurence Community Services Inc.

genU is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC) and operates in accordance with the NDIS Quality and Safeguards Commission Practice Standards and other applicable state and federal legislation.

genU's purpose is to create and deliver innovative services that enable people to live the life they choose, supporting inclusion, independence, and participation for people with disability, older Australians, and the broader community.

The Board of Directors is genU's governing body and is responsible for overall oversight of governance, strategy, and risk. Day-to-day operations are delegated to the Chief Executive Officer and Executive Leadership Team, who are responsible for implementing organisational strategy and managing operational and compliance obligations, including those related to modern slavery reporting.

For more information about genU's structure and operations, please refer to our most recent Annual Report, available at www.genu.org.au

SUMMARY OF 2024-2025 OPERATIONS

genU is a national organisation delivering services that empower people living with disability, older Australians, and jobseekers to live the life they choose.

genU proudly works with 48,900 people from communities right across Australia, with many gaining the benefits of accessing multiple coordinated services and programs.

Our strategy in the 2024-2025 year focused on creating inclusive pathways to independence and participation through four key service streams:

- **Disability Services** – Accommodation and Disability housing, Allied Health, behaviour support, lifestyle programs, psychosocial recovery coaching, school leaver employment pathways, social enterprises, supported employment, and support coordination (until January 2025).
- **Ageing Services** – Home care packages, Commonwealth Home Support Program, Allied Health, Retirement living, and carer support.
- **Training Services** – Accredited and non-accredited courses, corporate training, micro credentials, inclusive education workshops, and nationally recognised qualifications.
- **Employment Services** – Individual placement and support, Disability Employment Services, Workforce Australia programs, and JobAccess.



POLICIES

genU's policy framework provides the governance and practical tools that help prevent, detect, and respond to modern slavery risks across our operations and supply chains. These policies set clear expectations for ethical conduct, supplier management, and staff accountability. They are reviewed on a scheduled cycle, or sooner if laws, operations, or identified risks change. The following policies and procedures are directly relevant to genU's modern slavery approach.

Risk Management Procedure

Provides the organisation-wide framework for identifying, assessing and managing risks, including those linked to supply chains and compliance. It sets out roles, escalation pathways and review cadence so risks are recorded, monitored and acted on within governance.

Procurement and Purchasing Policy

Sets ethics, value-for-money and social-responsibility requirements for all sourcing. Embeds modern-slavery checks at tendering/onboarding, requires suppliers to confirm human-rights compliance, utilising a Contract Review and Execution checklist for controlled contracting and contract management expectations. It also directs suppliers to agree to the Supplier Code of Conduct.

Supplier Code of Conduct

Defines expectations for lawful employment, fair treatment, safe conditions and compliance with modern-slavery laws. Suppliers commit to these standards (and to cooperation with monitoring/remediation) as a condition of doing business.

Whistleblower Policy

Enables staff, contractors and stakeholders to report misconduct, including suspected modern-slavery concerns, confidentially and without reprisal, with oversight by the Whistleblower Protection Officer and Board.



IMAGE: Staff member Lili at the genU Support Hub in Highton, Victoria



BUSINESS AND SUPPLY CHAIN

genU works with a broad range of suppliers across industries such as health and care services, facilities management, professional and consulting services, and financial and technology providers.

The goods and services genU purchases include:

- Goods that are purchased to be transformed and then sold to customers, such as timber for genU's manufacturing operations which are used to produce items such as pallets, crates and furniture.
- Goods that are purchased for use in providing services, including the use of plant and equipment used to provide property care and horticulture services, or consumables used in providing industrial or administration services.
- Services that are purchased by genU include information and communication technology services, engagement of temporary personnel, transport and logistics services and professional services.
- International suppliers who principally supply information and communication technology services.

We recognise that different types of goods and services carry different levels of modern slavery risk, influenced by factors such as geographic location, industry sector, and labour intensity.

Our approach to assessing and managing this risk begins with understanding where we are most exposed. We consider:

- The nature of the goods and services procured (for example, labour hire, cleaning, technology, and facilities maintenance are typically higher-risk sectors).
- The countries in which our suppliers operate and where their products or raw materials originate.
- The structure and complexity of our supply chains, including whether goods or services are sourced domestically or internationally.

RISK ASSESSMENT

To assess our overall exposure, we focus on suppliers that represent the greatest proportion of our procurement spend. A supplier who provides goods or services valued at over \$75,000 in a financial year are requested to complete genU's Modern Slavery Questionnaire at onboarding and as part of an annual evaluation process. Responses are reviewed to identify areas where additional due diligence, remediation, or engagement may be needed.

To strengthen our visibility and ensure consistent evaluation, genU uses the Informed 365 platform. This platform supports our monitoring and reporting by:

- Benchmarking supplier responses against industry standards, and
- Profiling risks using three key metrics — country, industry, and overall compliance rating.

Evaluation across these criteria produces an aggregate score known as the Informed365 Slavery Risk Index (ISRI), which serves as a benchmark for genU's overall modern slavery risk exposure.

Through this partnership, genU is also a founding member of the For Purpose Consortium, a collaboration of not-for-profit organisations sharing best practice and data insights to improve modern slavery risk management across the sector.

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Business and Supply Chain continued

A detailed review of the responses from our suppliers, or their publicly available statements was conducted. Of note from the review:

- 198 suppliers were selected for review (top 80% suppliers based on spend).
- Of these, 118 suppliers or 60% provided or had available modern slavery data in various formats.
- 60 have a Modern Slavery Statement available, noting most have not provided an updated report for FY2025 given the reporting deadline is December 2025.
- 40 suppliers participated in/ completed genU's Modern Slavery Survey, with an additional 11 having started but not completed the survey.
- 8 suppliers had a Modern Slavery statement on their website, despite not completing our survey.
- Of those suppliers that have not responded to genU's survey or where a Modern Slavery Statement is also not available (99), genU has endeavoured to obtain additional information on the suppliers for review. Of note majority of these suppliers are from professional services within Australia. The risk of modern slavery in these organisations is considered to be low.

Using the Informed 365 framework, genU's current risk profile indicates:

- Very low risk in relation to the countries in which our suppliers operate.

Whilst genU purchases from suppliers who are based in Australia and overseas, its suppliers are predominately located in Australia, are Australian owned and operated, and so are deemed generally less likely to engage in practices that would constitute modern slavery.

- Medium risk in relation to the industries in which they operate.

Higher-risk categories for genU include health-care services, agency staffing, commercial cleaning, and food supply. Most Australian suppliers used by genU are specialised providers requiring highly skilled staff, who have therefore been assessed as likely to be well paid and have good working conditions. genU has assessed these suppliers as having a lower risk of modern slavery practices.

- The overall analysis indicates that genU is operating within a low modern slavery risk profile.

The aggregated results from supplier questionnaire responses, combined with benchmarking based on the countries and industries in which our suppliers operate, indicate a total Informed365 Slavery Risk Index (ISRI) rating of 36%. This suggests that the majority of suppliers have established governance frameworks and demonstrate awareness of modern slavery obligations. genU continues to strengthen this foundation by enhancing data completeness and tracking supplier performance over time.

These results are consistent with previous reporting periods and continue to inform where we focus training, policy development, and supplier engagement efforts.



DUE DILIGENCE IN SUPPLIER SELECTION

genU engages large suppliers and providers through a competitive tender process to render any goods or services to our organisation. As part of this rigorous process, suppliers are required to positively respond to several requirements including social responsibility, diversity and modern slavery, all of which are considered when selecting appropriate suppliers for the final contract. The successful applicant is requested to submit responses to the Modern Slavery Questionnaire prior to beginning any work with genU and to sign a Supplier Code of Conduct. This assists suppliers to understand the Modern Slavery practices they should apply in their own operations and supply chain and any matters they should report to genU.

STAFF TRAINING AND AWARENESS

genU continues to incorporate information and resources to all team members when delivering procurement training and has updated an internal training module called *Addressing Modern Slavery* which is required to be completed by the below team members within the organisation:

- All members of our Executive and Senior Leadership teams
- All managers
- All staff and their managers who either raise and approve Purchase Orders or perform a contract manager role.

genU also has Modern Slavery principles embedded into all Procurement processes.

RECENT ACTIONS TAKEN

As part of genU's commitment to managing Modern Slavery risks in our operations and supply chain, our Modern Slavery plan has incorporated short, medium, and long-term actions to improve our management of potential modern slavery risks.

Actions progressed during this reporting period include but are not limited to:

- Redevelopment of the Procurement and Purchasing Policy to determine the engagement required with suppliers based on the level of risk.
- Embedding the Modern Slavery Questionnaire into relevant supplier onboarding forms including sourcing and tender activities to increase the uptake in supplier completion.
- Improved training of our staff to ensure awareness of modern slavery risks specifically for those that are involved within the procurement processes, such as belonging to a tender panel or a contract manager.
- Implementation of a new operating model to centralise all procurement activities across the organisation which will allow greater controls to be put in place for the management and onboarding of all suppliers that provide goods and/or services to genU
- Onboarding a large influx of new suppliers following the merger between genU and Activ Foundation Limited, with ongoing review and assessment.
- Regular attendance and input to the Informed365 roundtable meetings and PASA quarterly legal updates to increase engagement.



FUTURE PLANS

We are working on broadening and enhancing our analysis and training of our supply chains against modern slavery values whilst looking at ways to strengthen our internal controls.

genU anticipates that in the next reporting period many initiatives will be investigated and implemented including:

1. Implementation of category management within our procurement and purchasing teams. This will ensure that team members dealing with suppliers on a regular basis are well versed in modern slavery principles and requirements and can identify risks quickly and effectively within high-risk categories.
2. Modern Slavery Plan to be enhanced to include actions to actively investigate and mitigate any Modern Slavery risks within the suppliers identified during the annual assessment
3. Publish any findings, insights, or outcomes from our Modern Slavery risk assessments and engagement activities, ensuring transparency and accountability across our operations and supply chains.

CONCLUSION

genU remains steadfast in our commitment to combat Modern Slavery and human trafficking

This Modern Slavery Statement reflects our ongoing efforts and our dedication to transparency, ethics, and social responsibility

Through meticulous process review and reform, we will continue to work diligently and in collaboration with like-minded partners to ensure that our operations and supply chain are free from any form of modern slavery.

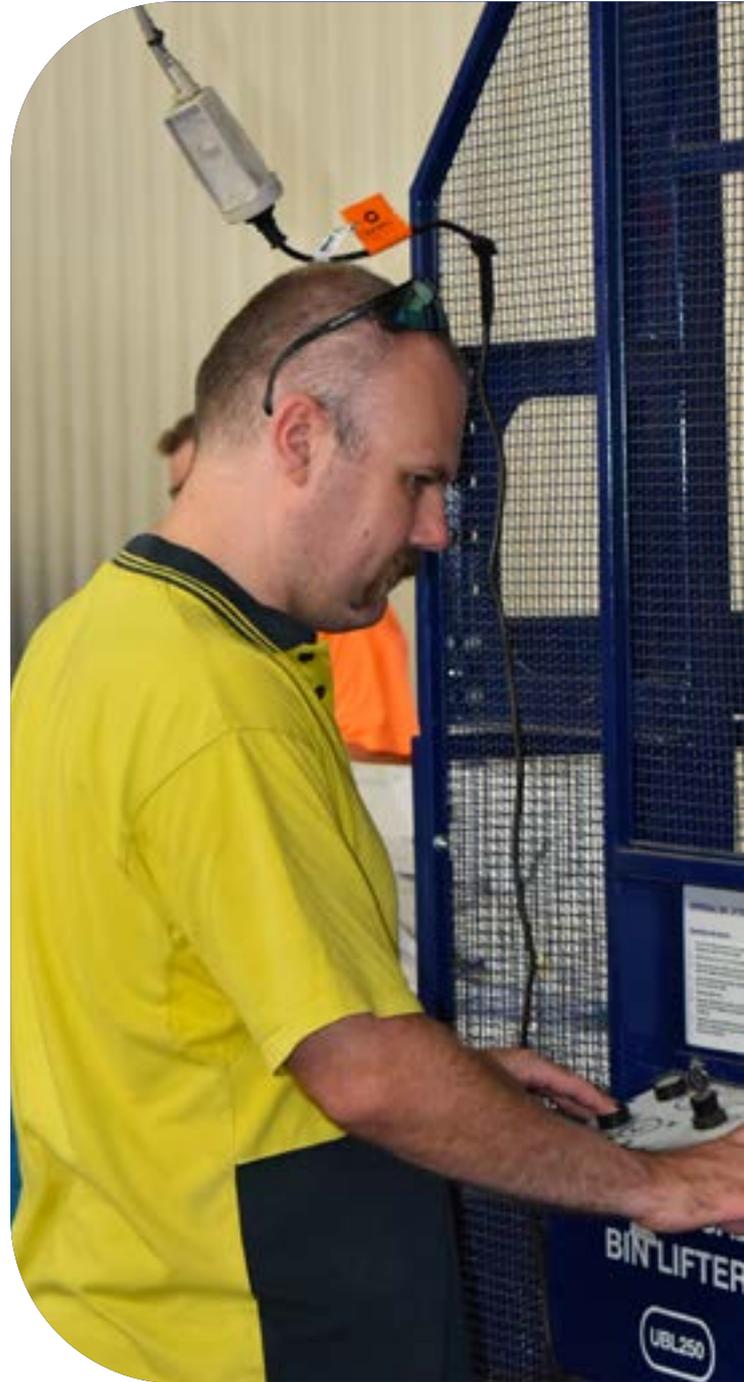


IMAGE: Matthew, secure document shredding as part of genU's social enterprises services



THANK YOU FOR READING
GENU'S MODERN SLAVERY STATEMENT.

If you have any questions about the information
contained in this statement, please contact:
companysecretary@genu.org.au

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