

PeopleKind Group

We're for people

**PeopleKind Group (PKG)
Modern Slavery Statement
Financial Year Ended 30 June 2024**

Table of Contents

Foreword	3
Mandatory Criterion 1: Identify the Reporting Entity - PeopleKind Group (PKG)	4
Mandatory Criterion 2: Describe PKG's structure, operations and supply chains.....	5
Mandatory Criterion 3: Describe the risks in PKG's operations and supply chains.....	6
Mandatory Criterion 4: Describe the actions taken by PKG to address the risks, including due diligence and remediation.....	7
Mandatory Criterion 5: Describe how PKG assesses the effectiveness of any remediation processes undertaken.....	8
Mandatory Criterion 6: Describe the process of consultation with any entities owned or controlled by PKG.....	8
Mandatory Criterion 7: Provide any other relevant information.....	8

Foreword

Modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It can occur in many forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage and any forms of child labour.

The introduction of the Modern Slavery Act 2018 aims to combat modern slavery in global supply chains.

PeopleKind Group (PKG), ABN: 11 652 673 553, is a Company Limited by Guarantee and is registered as a charity with the Australian Charities and Not-for-profits Commission. PKG is committed to ensuring that the risks of modern slavery in our business operations and supply chains are managed and minimised.

We are pleased to submit our statement on modern slavery which is an expression of our commitment as a socially responsible organisation, and a reflection of PKG's Vision, Purpose and Values, details of which follow.

Vision: To build a community where everyone belongs and feels connected;

Purpose: To empower people to live their best life; and

Values (we are)

- Compassionate:** We listen with our hearts and minds, understanding that everyone has their own journey.
- Respectful:** We respect ourselves, our colleagues, and the people we support. We are open to new ways.
- Collaborative:** We understand we're all in this together. We work together with a 'can do' attitude to achieve mutual goals.
- Resilient:** We bring our best self to work, recovering quickly when things change.
- Courageous:** We have the courage and integrity to do what's right, even when it is hard.

PKG is a reporting entity under the *Modern Slavery Act (2018)* and this Modern Slavery Statement covers the reporting period 1 July 2023 to 30 June 2024.

The Statement outlines the approach PKG has taken to identify, assess and manage modern slavery risks in our operations and supply chain.

This statement was approved by the Board of PeopleKind Group on 30 April 2025.



Evelyn Hogg
Chairperson

Mandatory Criterion 1: Identify the Reporting Entity - PeopleKind Group (PKG)

PKG is a Public Benevolent Institution (PBI) with Deductible Gift Recipient (DGR) status and has provided innovative and people-focused services to the communities we serve for over 70 years, largely through Nulsen Disability Services.

PeopleKind Group is one of Western Australia's largest human service providers. The services delivered through our various organisations encompass disability services, child protection, young people support, allied health, housing, justice, reintegration, mental health and training.

PeopleKind Group incorporates the following wholly owned or Controlled Entities, collectively known as the PeopleKind Group:

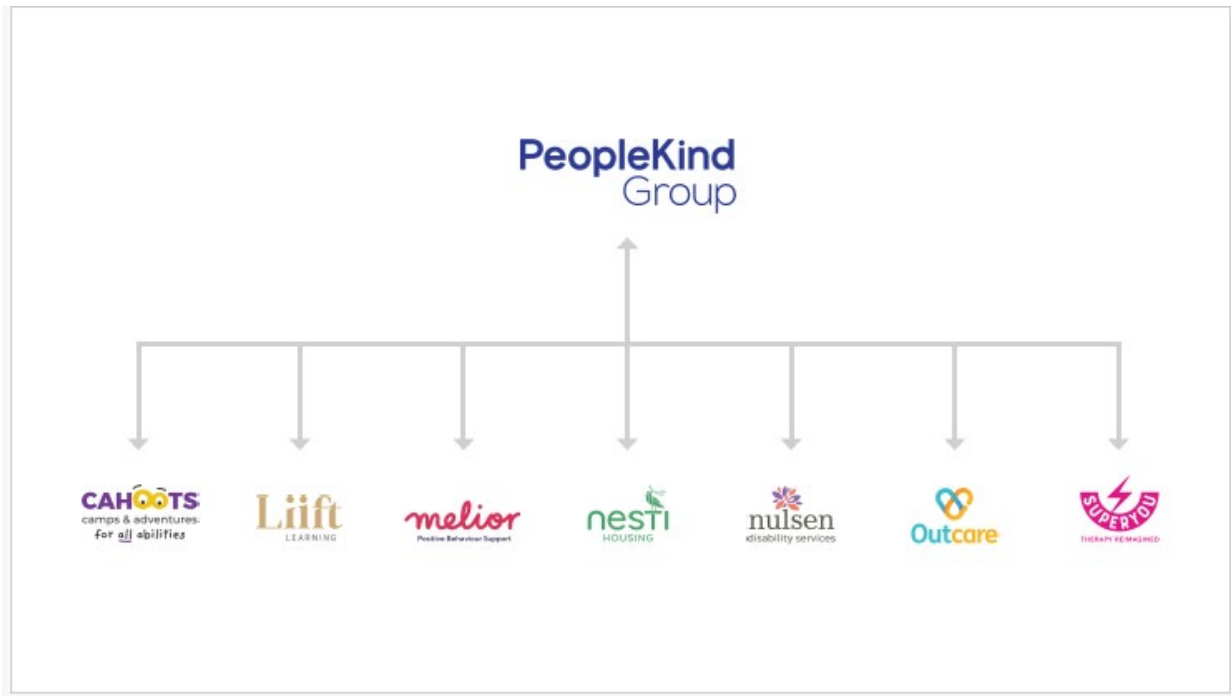
- | | |
|--------------------------------------|-----------------------------------|
| (1) PeopleKind Group Ltd | ABN: 11 652 673 553 |
| a. Melior Positive Behaviour Support | |
| b. Outcare | |
| c. Superyou Therapy | |
| (2) Cahoots Org | ABN: 61 107 589 574 |
| (3) Liift Learning | ABN: 65 670 810 036 |
| (4) Nesti Housing Realty Pty Ltd | ABN: 17 664 553 477 |
| (5) Nesti Community Housing Ltd | ABN: 64 625 479 709 |
| (6) Nulsen Group Ltd | ABN: 43 130 353 890 |
| (7) Lady Lawley Foundation Ltd | ABN: 91 656 254 901 [inoperative] |
| (8) Portle Pty Ltd | ABN: 38 666 956 485 [inoperative] |

As a Company Limited by Guarantee, PKG is governed by a Board of Directors. PKG's independent Board is responsible for overseeing the governance, strategic direction and the efficient, accountable and effective management of the PeopleKind Group's business operations. The Company is managed by a Group CEO who is supported by an Executive Team.

The Boards of each Controlled Entity (Nesti Housing Realty Pty Ltd, Nesti Community Housing Ltd, Nulsen Group Ltd) provide oversight of the operations of the respective Controlled Entities while operating within the boundaries of the PeopleKind Group Governance Framework.

Mandatory Criterion 2: Describe PKG's structure, operations and supply chains

Structure



The antecedents of the PeopleKind Group go back over 70 years with the formation of what was then designated as the Mentally Incurable Children’s Association. That organisation evolved into Nulsen Haven and, in turn, Nulsen Disability Services. With the advent of the National Disability Insurance Scheme, it was deemed prudent to diversify into PeopleKind Group and provide a range of complimentary services to the human services sector. A brief summary of the services provided is outlined below.

Cahoots	helping young Western Australians live their best lives with a variety of inclusive Services.
Liift Learning	empowering individuals and organisations by delivering excellence in diverse and innovative training solutions.
Melior	creating strategies for life through Positive Behaviour Support.
Nesti Housing	bringing opportunities home through Specialist Disability Accommodation (SDA), social housing and property management services.
Nulsen	empowering people with complex disability to live their best life.
Outcare	providing justice, reintegration and support services to help people engage positively with the community.
Superyou	providing therapy and allied health services for people with disability.

Operations

PeopleKind Group operates, in large part, in the greater Perth metropolitan area but does provide some services in Albany, Bunbury and Kalgoorlie. PeopleKind Group has no operations outside of Western Australia.

As at 30 June 2024 PeopleKind Group employed 1,155 personnel and supported 5,415 clients. Our strategic focus during the year in question was to ensure that we continued to empower the people we support to live their best life and reduce disadvantage within our community.

Supply Chains

As a human services organisation, the bulk of PeopleKind Group's expenditure is associated with employee costs. PeopleKind Group undertakes most of the procurement for the Group and endeavours to use local suppliers where possible with a view to supporting local businesses and creating long-term relationships.

The Types of goods and services we obtain and use include the following.

- Medical consumables
- Equipment/machinery
- Fleet services
- Facilities Management
- Real estate
- Construction services
- Textile related goods
- Utilities
- Allied Health Services
- Agency contracts/staff
- ICT hardware and software
- Travel services
- Office supplies

Mandatory Criterion 3: Describe the risks in PKG's operations and supply chains

As a human services provider operating in a number of highly regulated sectors, PeopleKind Group considers the risk of Modern Slavery within its direct operations to be low.

PeopleKind does, however, recognise that through its supply chains as detailed under Mandatory Criterion 2, it may be indirectly exposed to the risk of modern slavery and human trafficking, and it acknowledges there can be limitations in its practical ability to scrutinise the supply chains of parties who supply the Group with goods and services.

Nevertheless, it is recognised that increasing scrutiny of the suppliers comprising our supply chain is warranted and will have our ongoing attention going forward.

Mandatory Criterion 4: Describe the actions taken by PKG to address the risks, including due diligence and remediation

We have reviewed our list of suppliers for the financial year ended 30 June 2024. Given that PeopleKind Group and its wholly owned or Controlled Entities provide services to the human services sector, the bulk of our expenditure is related to employee salaries and related costs.

Therefore, the expenditure of only one of our suppliers exceeded \$1 million. Overall, we identified 24 suppliers whose level of expenditure exceeded \$100K. A Modern Slavery survey was submitted to 18 suppliers with a specific focus on Modern Slavery reporting requirements, policies and procedures, identification and mitigation of risk, employee awareness and training, supply chain exposure, recruitment practices, overall compliance with the Act, and including, if applicable, their reporting requirements. The remaining 6 suppliers were 5 large corporations and one government department, all of whom were aware of their Modern Slavery reporting and compliance obligations.

Of the 12 out of the 18 suppliers who responded to our survey, no Modern Slavery risks were identified that would warrant the PeopleKind Group undertaking corrective mitigation steps at this point in time.

A concise summary of the **12** supplier responses received on the questions posed follows.

- Number who are required to submit a Modern Slavery Statement - **1**
- Number who have a Modern Slavery Policy in place - **3**
- Number who are aware of the existence of Modern Slavery within their organisation - **0**
- Number who train their employees on Modern Slavery matters - **4**
- Number who perform screening of prospective suppliers - **4**
- Number who are aware of the existence of any Modern Slavery within their supply chains - **0**
- Number who would respond to allegations of Modern Slavery within their supply chains - **10**
- Number who employ due diligence activities to endeavour to identify, prevent and mitigate Modern Slavery risks within their supply chains - **5**

The size and type of activity of most of the 12 respondents would explain the mixed response we received to our questionnaire. Interestingly, almost all of those who indicated they have given limited attention to the matter of Modern Slavery to date did express that they intend to correct that oversight in the future. That was encouraging and, of course, a logical and positive outcome of this process.

Given this is the first Modern Slavery Statement we have completed, we will look to the further enhancement of our due diligence of our suppliers and contractors to ensure they operate in accordance with all applicable modern slavery legislation.

Additionally, we will look to increasing the awareness of our employees as to the adverse impact of Modern Slavery through enhancing our training and education programs.

Further, we will undertake a review of our Modern Slavery Policy and Procedures with a view to ensuring that they continue to be effective and fit for purpose.

Mandatory Criterion 5: Describe how PKG assesses the effectiveness of any remediation processes undertaken

As previously stated, this is the first Modern Slavery Statement that PeopleKind Group has been obliged to submit. To date, we have yet to identify any issues of concern relating to our suppliers. Therefore, no remediation processes have been undertaken at this point in time.

That said, while we consider our exposure to Modern Slavery risks is low, we will be looking to enhance the following monitoring, evaluation and reporting mechanisms in the future to reinforce our commitment to ongoing continuous improvement.

- Liaise and collaborate with our existing suppliers on compliance with modern slavery laws and practices.
- Ensure our suppliers are aligned with our Values.
- Undertake appropriate due diligence when evaluating a potential new supplier.
- Ensure our relevant Policies and Procedures reflect Modern Slavery thinking.
- Undertake internal and external auditing as appropriate.
- Monitor any Modern Slavery complaints or concerns and take appropriate remedial action if warranted.
- Ensure that the concept of Modern Slavery is incorporated within our induction and training programs.

Mandatory Criterion 6: Describe the process of consultation with any entities owned or controlled by PKG

The Managing Directors or Chief Executive Officers of the 7 organisations that comprise PeopleKind Group were consulted as part of the preparation of this Statement and had nothing to add, given that PeopleKind Group undertakes the bulk of the procurement on behalf of the Group.

Additionally, the Statement has been reviewed by the PeopleKind Group's Risk and Clinical Governance Committee and Board.

Mandatory Criterion 7: Provide any other relevant information

We have no additional information to provide in this initial Modern Slavery Statement.