



**Lifestyle
Solutions**

Modern Slavery Statement

Reporting period ending 30 June 2020
Lifestyle Solutions (Aust) Ltd (A.C.N 097 999 347)



Lifestyle Solutions (Aust) Ltd (**Lifestyle Solutions**) provides this Statement under section 13 of the *Modern Slavery Act 2018 (Cth)* (**the Act**).

Lifestyle Solutions acknowledges our obligations to protect human rights, from the way we conduct our business now and into the future. Lifestyle Solutions is committed to ensuring there is transparency in its operations and approach to tackling modern slavery. Lifestyle Solutions has procedures in place to mitigate and eradicate the risk of exploitation.

While this Statement is our first public disclosure specifically addressing modern slavery in line with the requirements of the new Act, Lifestyle Solutions has been committed to the improvement of the rights and wellbeing of people across our operations for many years.

We understand that modern slavery is unlikely to prosper where other human rights are respected and that the Act draws on principles adopted in the 2011 United Nations Guiding Principles on Business and Human Rights (**UNGPs**) which set a global standard of expected conduct for all business enterprises.

Lifestyle Solutions undertakes to comply with the Act, the UNGPs and all other applicable modern slavery and human rights laws and frameworks.

This Statement sets out the steps we have taken during the financial year ending 30 June 2020 to identify, assess and address the risks of modern slavery within our operations and supply chains. Our approach includes a commitment to continuous improvement as we increase our understanding and awareness of modern slavery risks.

Mandatory Criteria 1 and 2 – Identification, Structure, Operations and Supply Chain

Lifestyle Solutions is a not-for-profit organisation and is a company limited by guarantee. We engage approximately 2,300 employees and we work to support around 2,400 people and their families in our communities. Lifestyle Solutions is not part of a larger corporate group of entities and does not own or control any other entities. Lifestyle Solutions also trades under the brand names of Bindi Enterprises and Camp to Belong. Lifestyle Solutions operates entirely in Australia.

Lifestyle Solutions' provides services for people living with disability in the areas of supported independent living, individual supports and community/social/recreation supports, clinical supports, support coordination, disability enterprise and transition to work supports. Lifestyle Solutions provides services for young people on Out of Home Care and foster care.

Lifestyle Solutions' values drive day-to-day behaviour which are fundamental in protecting our staff and the people we support:

- *Own it* – How we get the job done
- *Respect Lives Here* – How we treat other people
- *Keep Calm & Be Happy* – How we interact with other people
- *Make it Matter* – How we make a difference to other people

Our supply chains are multi-tiered, consisting of approximately 3,400 suppliers. Our suppliers are engaged to enable the support services we provide, and we understand that the vast majority of our suppliers operate in Australia.

Lifestyle Solutions has acquired 3 commercial properties for office space and 4 residential properties for the purpose of delivering accommodation services to customers.

Mandatory Criteria 3 – Risks in our Operations and Supply Chains

Lifestyle Solutions understands that every entity has modern slavery risks and is focused on understanding where such risks may be present within our operations and supply chains. Lifestyle Solutions also acknowledges that there is a continuum of conduct in this area, including the risk that we might cause, contribute to, or be directly linked to modern slavery.

Lifestyle Solutions considers the risk of modern slavery within its direct internal operations to be low. We operate entirely in Australia, which is considered to pose a lower geographic risk in relation to prevalence of and vulnerability to slavery. Our primary operations consist of services delivered to vulnerable people in our community and as such the very core of our business involves a deep understanding of vulnerable people including the risks of exploitation when working with these individuals and groups. As such, we believe we have an entrenched culture of ensuring that vulnerable people are seen, heard and treated with respect and dignity.

Further to that, due to the nature of the work we do, we are subject to rigorous laws and regulations requiring due supervision and a high duty of care to be taken in all of our activities. Lifestyle Solutions has a zero-tolerance approach towards the exploitation of vulnerable people.

In relation to our supply chains, we recognise that Lifestyle Solutions has a complex multi-tiered supply chain and that our procurement needs are diverse. We understand this increases the risk of our organisation being directly linked to modern slavery practices through the activities of another entity that we have a procurement relationship with.

Our journey to fully and accurately understanding where our risks lie is a continuing one. The purpose of identifying these risks above is so that Lifestyle Solutions can more accurately assess, address, and mitigate these risks.

Mandatory Criteria 4 and 5 – Actions to Assess and Address our Risks, Effectiveness

Our Policy

Lifestyle Solutions believes that all of its staff have a responsibility to prevent, identify and report on any concerns they may have relating to modern slavery; we believe our staff are our first line of defence. As such, we have set out Lifestyle Solutions' approach to identifying, assessing and addressing modern slavery risks in a specific Modern Slavery Policy that was approved by our Board and enacted during our first reporting period under the Act. This Policy expressly enshrines our zero-tolerance approach to modern slavery within our operations and supply chains and forms a key part of both our due diligence and remediation processes.

The Policy reflects our commitment to:

- Increase awareness of modern slavery risks; and
- Reduce such risks in our production and supply chains.

The Policy applies to all directors, leaders, executives, officers and employees, full-time, part-time, and casual as well as volunteers at every level of Lifestyle Solutions. It explicitly references and requires compliance with the Act, as well as the Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework; the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

The Policy incorporates a set of procedures to further our due diligence and commitment to prevent, detect and report the risk of slavery or human trafficking within our operations and supply chains. The Policy articulates the fundamental elements of Lifestyle Solutions' approach to human rights and how we demonstrate our commitment to respect human rights in line with the Act. It also provides for reporting protections via our Whistleblowing Policy and Processes.

To date we have made good progress on awareness training for employees in supply-chain facing roles regarding this Policy and modern slavery generally and have built an understanding of the activities of our higher risk suppliers. In addition to our human rights onboarding training, we have recently developed tailored modern slavery awareness training for all staff regarding the risks businesses face in relation to modern slavery in its supply chains. Our training will be provided on an ongoing process, allowing us to improve upon existing processes and remediate any deficits.

Our policies and processes regarding broader human rights and modern slavery are outlined in our Code of Ethics and Conduct. This sets out the minimum ethical standards expected of all employees and directors of the Company, as well as contractors, sub-contractors, agents and other personnel. Lifestyle Solutions has numerous other internal policies that ensure performance in accordance with the principles of best practice and continuous improvement.

Reporting

Lifestyle Solutions expects all of its employees to comply with our human rights and modern slavery commitments. Our Whistleblowing policy provides employees with established standards for appropriate workplace behaviours and conduct and provides the avenue for reporting incidents or improper conduct. The Whistleblower policy enables all employees to comfortably and confidentially report any concerns, including those that they have relating to modern slavery in Lifestyle Solutions' operations or within supply chains.

Governance

Being a for-purpose organisation, ethics and good governance are crucial to what we do. We believe the following factors assist in our due diligence endeavours to identify, assess, and address risks of modern slavery in our operations and supply chains:

- Expertise applied in practice to our workforce in relation to workplace, industrial relations and workplace health and safety regulations;
- All employees, directors and volunteers of Lifestyle Solutions are required to provide 100 points of identification, police check undertaken and evidence of their right to work in Australia prior to commencement of employment;
- Lifestyle Solutions has robust governance and compliance mechanisms in place that mitigate the risk of human rights abuses occurring. The board and its sub committees have robust safeguarding oversight (Quality and Safeguarding Committee, Audit, Risk and Compliance Committee, Governance Nomination and Remuneration Committee).

Suppliers

Lifestyle Solutions undertakes supplier due diligence in order to identify and assess the risks of modern slavery practises.

Suppliers have been contacted to inform of our reporting obligations in relation to the modern slavery legislation and with specific purpose to engage partnerships with our suppliers to equally commit to the eradication of modern slavery and human trafficking.

We have also developed a Supplier Code of Conduct in order to clearly articulate the standards of practice expected of our suppliers in relation to our modern slavery approach and further our due diligence in this area. This has been enacted for new suppliers and we are in the process of transitioning current suppliers onto the Code. Lifestyle Solutions wishes to partner with suppliers who are willing to join us in strengthening our response to modern slavery and who are committed to high standards of transparency and ethical conduct. We expect and contractually require suppliers to cascade down the commitments they adopt within the Code to their own supply chains.

The Code explicitly references and requires compliance with the Act, as well as the Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework; the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour. The Code also references multiple other Human Rights related laws and instruments and requires compliance with same.

Contractual Assurance

Lifestyle Solutions has conducted a labour risk assessment of its contracts, embedding modern slavery specific clauses and due diligence practices for all new contracts.

Within the reporting period we improved our practices with regard to contractual assurance and have included provisions in our contracts under which services and procurement are engaged. Among other things these contractual clause provisions now require suppliers to:

- warrant that modern slavery practices do not exist in their own businesses;
- warrant, to the best of their knowledge, that modern slavery practices do not exist in the businesses of their suppliers;
- warrant that they will notify us if they become aware that modern slavery is taking place in their operations or supply chains;
- warrant that they have put in place their own processes to ensure these warranties are valid.

The provisions also permit Lifestyles Solutions to terminate the supply contract if not complying with the above.

COVID-19 Pandemic

Acknowledging the increased risks of modern slavery that the pandemic presents, Lifestyle Solutions has implemented business continuity measures alongside adopted government guidelines to minimise the disruption and contain the spread of COVID-19 across our sites in Australia.

We have openly communicated with our employees regarding COVID-19 measures and have taken steps to ensure employees have access to various support mechanisms to assist with these uncertain times. We have been careful to protect our workers and those we work with from illness with appropriate COVID-19 measures in place.

Lifestyle Solutions is still adapting to the changes that the pandemic has caused for all businesses and society. We plan to continually update our response and keep a watchful eye over the way the pandemic may inadvertently affect the risks of modern slavery within our operations and supply chains.

Effectiveness

Lifestyle Solutions acknowledges that we cannot improve upon our approach effectively in the future if we do not review the current processes and procedures to ensure they remain relevant, appropriate and effective.

Our Policy, Code and general modern slavery documentation all provide contact avenues by which employees and those external to our organisation may ask questions, raise concerns and provide feedback.

We have particularly robust whistleblowing policies allowing protections for those who have particular concerns to raise and we endeavour that the information gathered through any such reports will assist in Lifestyle Solutions constantly reviewing and adjusting its approach as necessary.

Mandatory Criteria 6 – Consultation

Lifestyle Solutions does not own or control any entities and as such there is no required consultation under the Act. Lifestyle Solutions has prepared this Statement via consultation between Mills Oakley and its internal corporate support functions.

Future Commitments

In the next reporting period, Lifestyle Solutions intends to:

- Continue to embed contractual provisions in respect of modern slavery compliance in all new contracts with suppliers;
- Issue a screening questionnaire to broader procurement suppliers to enable further transparency of risk associated with modern slavery in their supply chains.

This Statement was considered and approved by Lifestyle Solutions principle governing body for the financial year ending 30 June 2020 on 25 February 2021.



Andrew Hyland

CEO



Julie Connolly

Director, Responsible Member of Lifestyle Solutions Board of Directors and Principal Governing Body