



MODERN SLAVERY STATEMENT 2020-21

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 2020 to 30 June 2021.

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

A handwritten signature in black ink, appearing to read 'Stephen Roberts'.

Stephen Roberts
Karingal St Laurence Limited Chair

Dated: 24 November 2021



In the spirit of reconciliation, genU acknowledges the Traditional Custodians of Country throughout Australia.

We recognise their continuing connection to land, sea and community and we pay our respects to elders, past, present and emerging.

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Statement 2020-21

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MESSAGE FROM THE CEO



COMMITMENT STATEMENT

Karingal St Laurence Limited (genU) is committed to building our capabilities and capacity of our workforce to manage our obligations under the Australian Modern Slavery Act 2018 (the Act).

This is our second Modern Slavery Statement and we are proud of the work committed to, and the achievements reached by both our employees and suppliers. This Statement details the framework that controls the work and records our progress towards identifying and addressing modern slavery risks and maintaining responsible and transparent supply chains.

We acknowledge the United Nations Guiding Principles on Business and Human Rights. We believe that both the Act and these Principles align perfectly with our Vision, Mission and core Values. genU is committed to improving the lives of communities and enabling people to reach their potential.

We fully support the Act. While the estimated prevalence of modern slavery in Australia is comparatively low, it is likely that modern slavery also exists in the supply chains for goods and services sold in Australia and by Australian companies. We understand and accept that genU can play a role in reducing the issue of modern slavery which affects more than 40 million people worldwide.

This Modern Slavery Statement demonstrates the actions undertaken and planned activities to ensure that managing the risk of Modern Slavery is top of mind and ultimately becomes second nature to anyone with genU who transacts with a supply chain.

Warm regards,

A handwritten signature in black ink, appearing to read 'Clare Amies', written in a cursive style.

Clare Amies

Chief Executive Officer
Karingal St Laurence Limited (genU)

This statement was approved by the board of Karingal St Laurence Limited (genU) in their capacity as principal governing body of Limited (genU) on 24 November 2021.

This statement is signed by Clare Amies in her role as the CEO of Karingal St Laurence Limited (genU) on 24 November 2021.



STAYING CONNECTED

WELCOMING, INNOVATIVE, SAFE,
EMPOWERED, RESPECTFUL.



WHO WE ARE

OUR VISION

To build inclusive communities.

OUR MISSION

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

GenU has been supporting people with disability for almost 70 years, and we are proud of our rich and diverse history. We continue to grow our supports and services for older Australians, job seekers, employers, students and young people including pre-school and kindergarten-aged children.

Clients remain at the heart of our services. Our staff, volunteers, members, business partners and network of support organisations continue to deliver the highest level of care and support to those who need it most, right across Australia.

This year, we have also consulted with staff, volunteers, members and our Board to ensure genU's values align with what we are trying to achieve for all clients.

This work has resulted in refreshed values and behaviours which together form *The genU Way*. Every person has a role to play in living *The genU Way*, and ensuring our values-based approach makes a positive impact on our workplace culture.

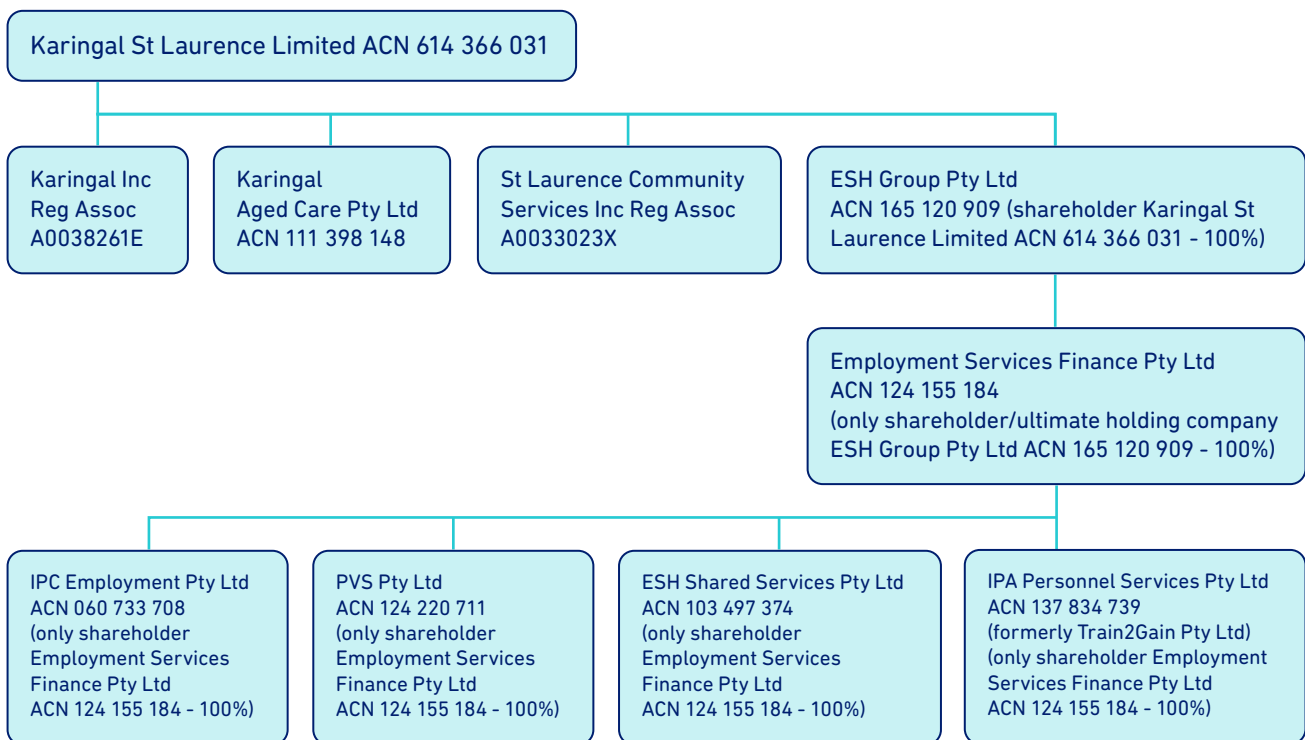
GenU is a great place to work and volunteer, and living *The genU Way* ensures clients and their families remain at the heart of who we are and what we stand for.



ORGANISATIONAL 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 the following organisational structure in place:



Our wholly owned subsidiary ESH Group Pty Ltd (ACN 165 120 909) heads up a corporate structure that includes five entities. One of these 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.

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.

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.

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 VALUES



WELCOMING

We are friendly and inclusive.



INNOVATIVE

We are courageous, inspired and creative.



SAFE

We care for our people, our clients, our communities and the environment.



EMPOWERED

We are capable, confident and supported.



RESPECTFUL

We are caring, honest and professional.

VALUES REFRESH

genU has recently refreshed its values after extensive consultation with members, the Board, staff and volunteers. The work was done to ensure genU's values aligned with our goals and expectations around behaviours supporting client outcomes.

As we outline above, *The genU Way* represents our refreshed values and behaviours and will create positive impacts for both staff and clients across every part of genU. Our refreshed values are: Welcoming, Innovative, Safe, Empowered and Respectful.

STRATEGIC PLAN 2019-2024 UPDATE

2020/21 lay the foundation for genU to grow its Strategic Plan 2019-2024. Our foundational goals gave us new enthusiasm to achieve long-term aims, while also responding to changing global circumstances.

The year has been successful despite ongoing challenges from the COVID-19 pandemic. We have completed a number of key strategy pieces, started important major projects and delivered small yet impactful improvements.

Importantly, 2020/21 has been about setting the foundations for delivering our Strategic Plan into the future. The next 12 months will be about delivering real change and benefits, both to our clients and our staff.

Working within the established 2019-2024 Strategic Plan, our teams have adapted and executed the plan's deliverables, which were developed by our key stakeholders. To aid in narrowing down our focus on specific objectives, a series of strategic ambitions and value propositions have been defined. Measurements are also being established to enable us to track and report our progress.

The foundational work to date has enabled the development of further initiatives that we will embark upon over the next three years. Most significantly, genU has been able to adapt to the changing business conditions in Victoria and throughout Australia. As an organisation, we have actively evolved and matured as a workforce, with our ongoing education and development making us more agile in our business environments.

Guided by our four strategic pillars: Client Focused, Passionate and Capable People, Innovation and Sustainable Growth, the plan has shaped our strategic priorities, key objectives, initiatives and business operating plans.

We appreciate and acknowledge the integral role our committed staff have played in bringing this Strategic Plan to life. Our values-led culture shapes everything that we do, and clients remain at the heart of genU. We also acknowledge the support and co-operation of our various funding partners and stakeholders.

You can access a copy of genU's 2019-2024 Strategic Plan at [genu.org.au](https://www.genu.org.au)

OUR STRATEGIC PILLARS



CLIENT FOCUSED



PASSIONATE AND CAPABLE PEOPLE



INNOVATION



SUSTAINABLE GROWTH



CONTINUED RESPONSE TO COVID-19

GenU has continued to respond quickly to the challenges of COVID-19, and has maintained its focus on keeping everyone safe, healthy and well.

BEING PROACTIVE IN A CHANGING WORLD

2021 has continued to bring the relentless challenges we endured throughout 2020, as COVID-19 changed the way we live and work.

Restrictions – particularly the extended lockdowns in Victoria and New South Wales – have meant that as an organisation we've had to find alternative ways to deliver our services so clients could continue to receive essential support. We've also had to take a new approach to flexible work arrangements for our staff.

With the vast majority of our organisation's work being classed as essential, we have been fortunate to continue to operate, and we've worked hard to respond to the challenges and restrictions we've faced.

CREATING COVID-SAFE WORKPLACES

Establishing effective workplace foundations in 2020, has ensured that all our workplace practices remain COVID-safe.

COVID-safe measures we have taken include:

- Mandatory mask-wearing and check-ins according to state government guidelines.
- Providing all appropriate Personal Protective Equipment (PPE) to staff through our online ordering and distribution system that operates out of genU Business Enterprises.
- Encouraging staff to look after their mental health, especially with the addition of new Employment Assistance Program (EAP) provider LifeWorks.

VACCINATIONS

This year also brought with it the opportunity to get vaccinated and help protect ourselves and our community.

GenU secured access to vaccines through a partnership with Aspen Medical in our Victorian areas. Our vaccine rollout prioritised clients and staff, but we were also able to facilitate vaccinations for families of staff and clients at genU. Overall, we have facilitated almost 1,500 vaccinations through this program.

We have encouraged staff and clients to have a vaccination through their doctor or at a community hub, and we're pleased to say we have 100 per cent compliance of mandatory vaccinations at Costa House, our residential aged care facility in Lara. We have very high rates of vaccinations in many of our other areas in disability and aged care.

We are extremely thankful to all those who have been vaccinated and for making the choice to help keep those vulnerable in our community safe. We continue to encourage and support all staff to get vaccinated when it becomes available to them.



Jane Riches in The Otway Kitchen.



Costa House team members Rosalie Rodrigues and Daisy Angeles.



Natasha Williams and Tessi McDowell at Tara's Dream.



Supported employees in Colac.



Melbourne team member Enrico Hipolito.

OUR SERVICES

GenU services are centred around people with disability, their carers, students, job seekers, employers, young people including pre-school and kindergarten-aged children and older Australians.

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:

- Individual support — for maintaining independence and reaching goals.
- Accommodation — including supported accommodation for people with disabilities, respite accommodation, aged care facilities and retirement living.
- Recreation activities — from community groups, day programs and adventure activities.
- Employment Pathways — skill building, placements, and opportunities for employment in a supported environment at genU Business Enterprises.

GenU also recognises the Carers Act 2010 and ensures carers should be considered as partners, acknowledging the unique knowledge and experience of carers.

MENTAL HEALTH

GenU's new low-intensity mental health service is free and provides access to eight sessions of intervention.

Available across Western Victoria, this service offers support to those at risk of, or suffering from, mild mental health conditions. Individual and group sessions are available, and participants can self-refer.

TRAINING

GenU is a Registered Training Organisation (RTO) passionate about providing education and training options in real work places to people with a disability, the long-term unemployed, and our community's most vulnerable people. We are developing a National Training Strategy, which will expand services across Australia.

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 biggest employment service providers in Australia, and the largest not-for-profit employment services provider, MatchWorks also supports employers to create diverse and inclusive workplaces.

RECRUITMENT

IPA Recruitment Services specialises in recruitment and labour hire. IPA recruits more than 1,500 people a year into temporary work. 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 school age, including a three and four year old kindergarten program.

OUR FOOTPRINT

GenU provides services in Victoria, New South Wales, Queensland, the ACT, South Australia and Western Australia.

MORE THAN
3400
STAFF ACROSS
AUSTRALIA



MatchWorks Queensland team members Diane Law, left, and Paul Hethorn with Aunty Flo Watson.

OUR PEOPLE

GenU staff and volunteer numbers

3428

TOTAL STAFF
2020/21

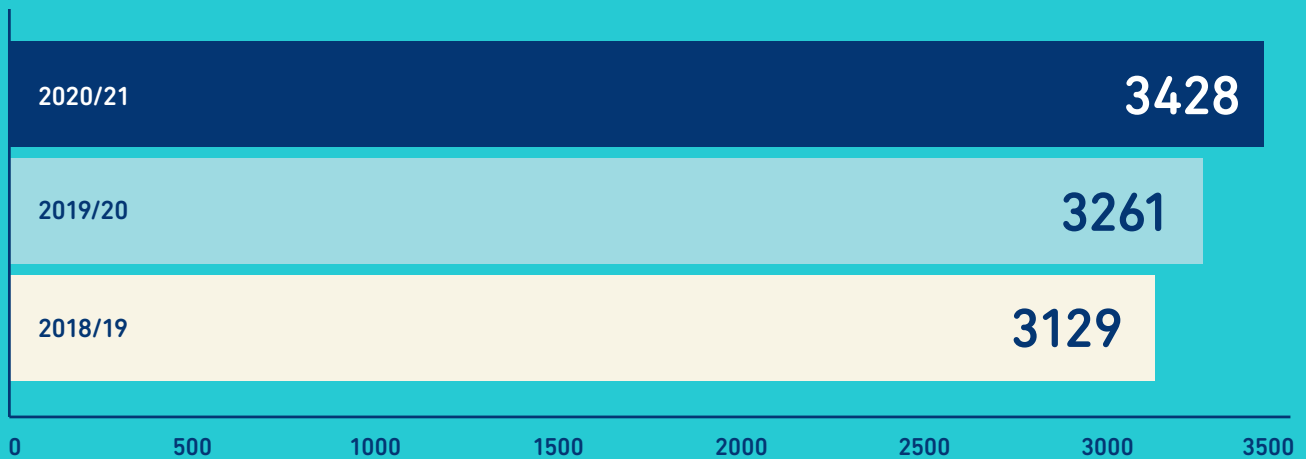
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FULL-TIME EQUIVALENT

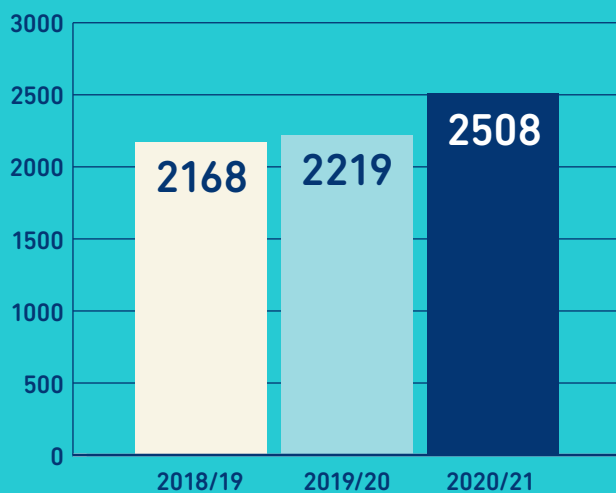
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VOLUNTEERS*

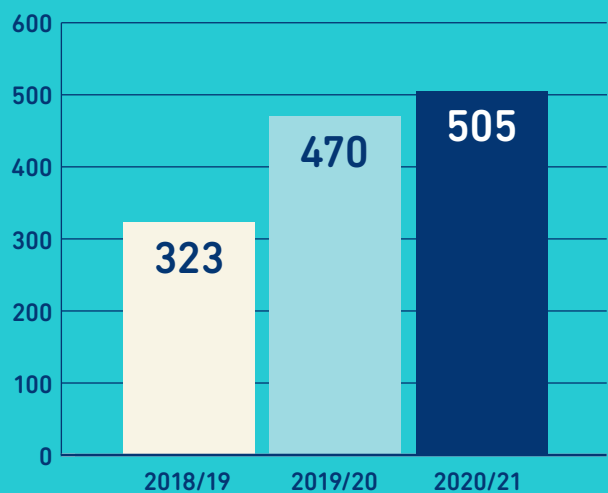
TOTAL STAFF



FTE STAFF



VOLUNTEERS



Figures correct as at June 30, 2021

Total staff – includes supported employees and employees from genU, MatchWorks and IPA.

*Volunteer figure includes 270 active virtual volunteers.

LABOUR HIRE

IPA

IPA is a division of genU and has been providing labour hire services for over 35 years, partnering with Australian employers of all sizes to deliver tailored solutions to meet their workforce needs.

As part of genU, IPA is a certified social enterprise recruitment agency, which sees 100 percent of profits support people with a disability and people from disadvantaged backgrounds.

According to Anti-Slavery Australia, 28 percent of all cases of modern slavery reported to the Australian Federal Police were for incidents of labour exploitation.

IPA has committed dedicated resources, policies, procedures and governance arrangements in place to ensure at all times, 'on hire' employees receive at least their minimum entitlements under the National Employment Standards and applicable modern awards. IPA also engages people to actively ensure the fair and equitable treatment of employees, including compliance with the Fair Work Act 2009 and related Federal and State legislation.

In addition to the genU wide Governance and Activities (recorded on page 18), IPA has additional controls in place specifically designed to manage labour hire services.

These include:

- IPA genU Procedure Determine On hire Employee Pay and Bill Rate and,
- IPA Onboarding Pack for employers, which includes:
- IPA On-hired Employee Employment Agreement
- IPA Policy Document
- IPA Code of Conduct
- IPA Privacy Policy and Collection Statement
- IPA Safety and Equal Employment Opportunity (EEO) Information

The recruitment, selection, onboarding and employment of on-hire employees is documented in an online operating system suite procedures and policies. All staff undergo training in how to apply the tenets of our operating system.

IPA does not engage workers overseas. Like many organisations, our modern slavery risk would be within our supply chain or that we place staff within organisations where they are at risk in their supply chains. The risk of modern slavery is further mitigated due to the nature of our major clients, these clients are fellow reporting entities under the Modern Slavery Act. Many of these entities have declared their commitment to identifying and reducing the impact of modern slavery in Australia.

HUMAN RIGHTS GOVERNANCE AND ACTIVITIES

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.

The following table records genU’s controls currently in place that support our commitment to uphold those treaties. These controls apply to all genU-controlled entities and provides both employees and suppliers both the opportunity and confidence that any grievance will be heard.

Policy and Related Documents	Committees and Groups	Training and Support
<ul style="list-style-type: none"> Diversity and Inclusion Strategy 2021-2024 Reflect - genU Reconciliation Action Plan 2020-2021 genU Code of Conduct Acceptable Behaviours Policy Family Violence Policy Keeping Children Safe Policy genU Gender Affirmation Guide Client Wellbeing, Rights and Responsibilities Foundational Policy Compliance Procedure Conflict of interest Procedure Delegations of Authority Policy Fraud and Corruption Prevention Policy and Procedure Fraud Control Plan Privacy Foundational Policy Risk Management Framework genU Brand Style and Inclusive Communication Guide Universal Access Policy Procurement and Purchasing Policy Supplier Code of Conduct and Declaration 	<ul style="list-style-type: none"> genU Diversity Council genU Gender Equity genU Disability Access and Inclusion Committee genU Reconciliation Action Plan Working Group genU Multiculturalism Advisory Group genU Pride Committee genU Care Governance Committee genU Risk Compliance & Integrity Management Committee 	<ul style="list-style-type: none"> Cultural Awareness Workshop Rainbow 101 Discrimination and Equal Employment Opportunity Keeping Children Safe genU Code of Conduct genU Fraud and Corruption Ignite Corporate Induction Privacy at genU Purchasing Goods and Services at genU Slavery in the 21st Century WHS Induction for new employees at genU Client Complaints and Feedback Staff Complaints and feedback Accessibility Document Writing and Tips

OUR SUPPLY CHAIN



SUPPLY CHAIN POLICY

The genU Procurement and Purchasing Policy follows a centre-led model where all genU staff, subject to our delegation policies and similar controls, are responsible for purchasing activities.

genU's Procurement department adopts a centralised model of procurement for continuous suppliers. A continuous supplier is a supplier who we spend more than \$150,000 per annum and provides us with ongoing provision of goods and services.

genU requires this cohort of suppliers to enter a formal contract, amongst other controls, and the appointment of a continuous supplier will initially be the result of a competitive market tender.

We procure across 22 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 55 percent of our procurement expenditure is directed towards continuous suppliers in the following categories:

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

The procurement department has profiled our purchasing behaviour from the past three years. The following supply chain analysis is of our continuous suppliers.

FINANCIAL TRANSACTIONS

genU spends, on average, \$102,000,000, across almost 4,800 different suppliers for the provision of goods and services.

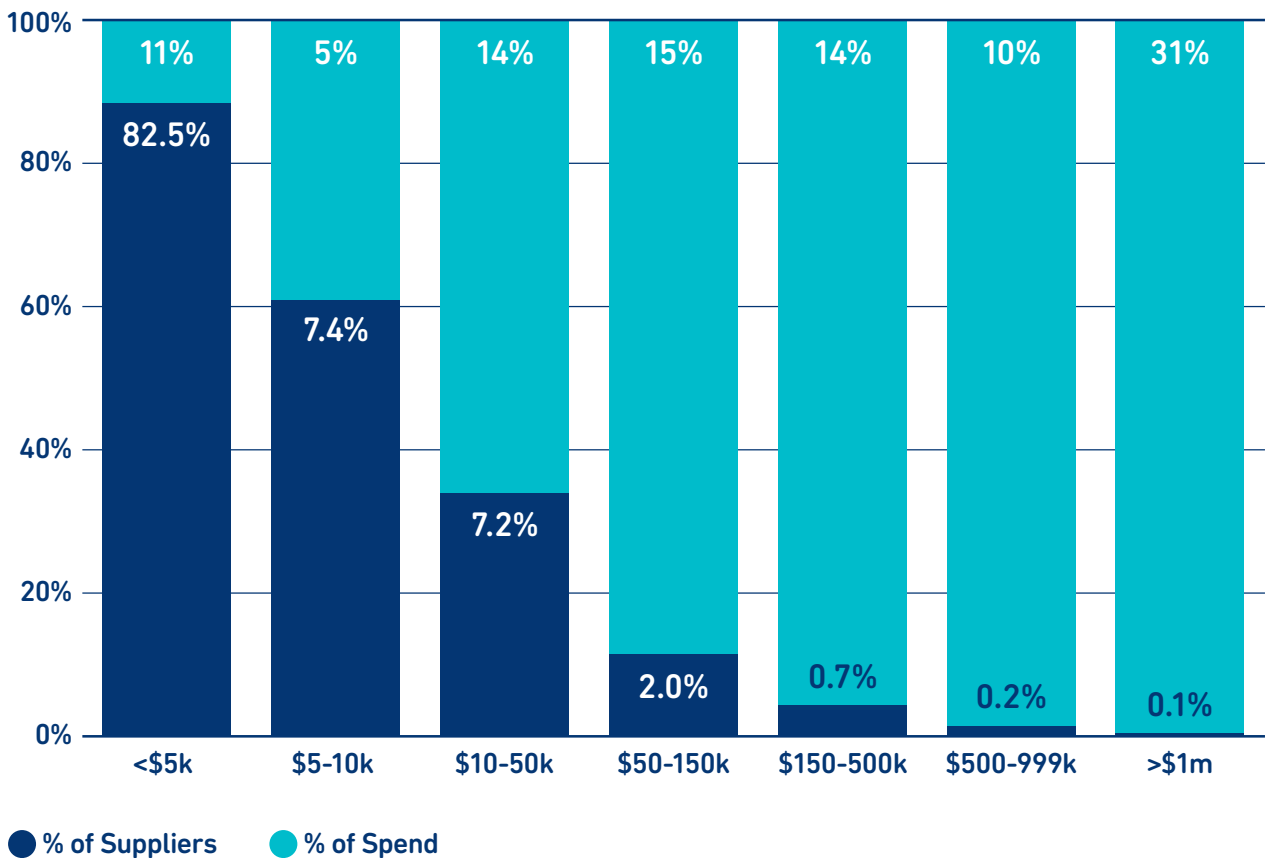
SUPPLIER PROFILE

The following chart shows the relative importance of a supplier to genU when reviewing through the lens of Modern Slavery. In summary, 1 percent of our suppliers account for 56 percent of total spend. Of particular importance, is that 0.1 percent of our suppliers account for almost one-third of total spend.

This small number of suppliers give confidence that genU can manage the required tasks of supply chain mapping and risk assessments with a high degree of confidence. Furthermore, the majority, 90 percent, of these suppliers have been supplying to genU for at least three continuous years.

In summary, and illustrating the challenge genU has when managing suppliers and their supply chain, less than 1 percent of suppliers are exposed to the centralised procurement team to coordinate and profile the risks of modern slavery. However, one of the benefits of partnering with Informed 365 is that we can effectively reach 100 percent of suppliers.

SPEND PROFILE - ALL SUPPLIERS



REPORTING YEAR IN REVIEW

In response to COVID-19, a new supply chain was established to source more of and different pieces of personal protective equipment (PPE). As we built a stockpile of PPE supplies during the first part of the 2020/2021 reporting period, it became a focus to review the many new suppliers to genU to ensure that they were managed and controlled in accordance with policy.

In response, genU centralised procurement of all medical PPE to our internal warehouse and distribution centre. Not only did this provide better control over suppliers new to genU, but it provided more supported employment opportunities through our Business Enterprises department. As the year progressed, the number of suppliers returned to normal levels as we prioritised retaining long-standing supplier relationships over continuing relationships with new suppliers.

Overall, COVID-19 did not disrupt our supply chains in any meaningful way. We were not required to source any of our primary categories from new suppliers, either on a temporary basis or more permanently. Any impact to genU was seen through delays in receipt of

goods. To combat this supply chain challenge, we implemented changes to our standard lead times. For example, lead times for ordering new fleet vehicles was pushed out from three to six months and then nine months as global supply constricted.

The genU procurement team has been restructured to acknowledge the role of procurement needed to change to meet, not only our obligations under the Modern Slavery Act, but also our objectives surrounding social procurement, sustainability and shifting from centre-led to a centralised procurement function.

The Procurement Team commenced and completed category reviews for high-risk categories of ICT equipment and office furniture. Due to the enhanced tender and contract documents, assessing the risks associated with modern slavery was conducted prior to supplier selection.

KEY INITIATIVES PROGRESS

The following table records the key initiatives planned for Year Two and the status as at the end of the year.

Initiative	Control	Status
Develop a Supplier Code of Conduct	Effectiveness Assessment	Complete
Procurement as lead function	Effectiveness Assessment	Complete
Review Financial Management system	Effectiveness Assessment	Complete
Enhance Contract Management	Effectiveness Assessment	Complete
Establish a process for regular management review	Continuous Improvement	Complete
Provide quarterly updates to our Board Risk Committee	Continuous Improvement	Complete
Continue to carry out appropriate due diligence as part of our RFT processes	Continuous Improvement	Complete
Continue with our training of employees in modern slavery	Continuous Improvement	Complete
Monitor reporting through grievance mechanisms	Continuous Improvement	Complete
Develop and continue to implement strategies to reduce modern slavery risks	Continuous Improvement	Complete
Conduct internal quality audits	Continuous Improvement	Complete

There were many individual tasks within each initiative. A list of the key tasks successfully completed as part of the initiatives, follows:

1. Updated the Terms and Conditions recorded on our Purchase Order, including referencing the new Supplier Code of Conduct
2. Group Procurement Manager joined the Risk Compliance & Integrity Management Committee, with Modern Slavery a standing agenda item
3. The structure of the Procurement department was reviewed, and two new positions created.
4. Development of an internal Contract Management system
5. Modern Slavery became a standard inclusion in our quotation/tender process
6. Modern Slavery became a standard inclusion in our Contracts Checklist
7. Procurement team members are attendees to Australian Border Force briefings and have completed their e-learning Modern Slavery Module
8. Development of a new Supplier Code of Conduct
9. Enhancement of the Procurement Policy to improve contract management and tender evaluation controls
10. Staff training focused on the procurement policy itself to build awareness of compliance – this communication and engagement program is ongoing and has reached almost 300 staff across all divisions and levels from the Executive team down.

OUR PROCUREMENT MODEL

In addition to focusing on the initiatives and controls set out in our Year 1 Statement, the Procurement Department reviewed all stages of the procurement cycle to gauge where and how Modern Slavery controls would fit.

The genU's procurement model reflects general industry practice and follows a six-stage model, as depicted in Figure 1, of Planning, Scoping, Tendering, Evaluation, Contracting and Contract Management.

Our efforts to identify and implement Modern Slavery controls over the past two years has resulted in every stage of procurement playing a role in managing the risks of modern slavery.

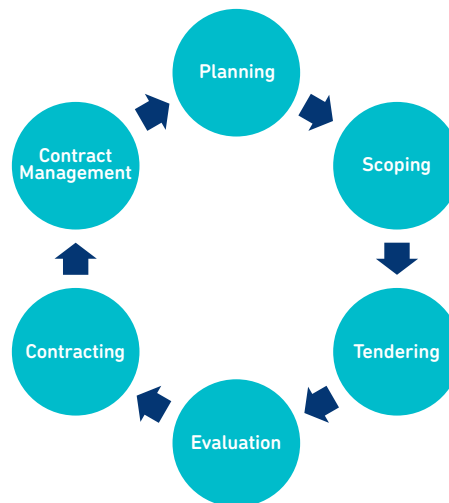


Figure 1 Modern Slavery Controls

Procurement Stage	Modern Slavery Control
1. PLANNING	Market intelligence; industry, commodity, and geographic risks
2. SCOPING	Identify suppliers, contractors and service providers
3. TENDERING	Profile suppliers; Review site, workforce and management profile, and the commercial relationship
4. EVALUATION	Modern Slavery risk is a key assessment criteria
5. CONTRACTING	Code of Conduct and Terms and Conditions
6. CONTRACT MANAGEMENT	Supplier Reviews identify risks and develop action plans

RISK CONTROLS

genU holds formal contracts and/or has held long-term relationships with all suppliers of ICT, Communications and Uniforms. The contracts in place have been a result of open market tenders which require all respondents to address modern slavery in their supply chains.

REPORTING YEAR 2020-21

Referring to the review of our Financial Management system conducted in Year 1, the review highlighted the current system was designed and primarily used for managing accounts receivable and payable. The system has minimal supplier and contract management features and limited reporting capabilities suitable for managing modern slavery. Due to other system priorities, genU does not expect that a full systems review will be conducted until 2022-23. To assist with bridging this technological gap, genU has partnered with Informed 365, a specialist provider of an integrated modern slavery platform.

This strategy will re-set our starting position for identifying and managing modern slavery risk within our supply chain. Using the experience and knowledge of Informed 365 we will develop a suite of Supplier Assessment Questions that can be tailored to different entity types and suppliers who hold inherent risks due to the industry, commodity, or location.

Furthermore, genU will be joining a Not-For-Profit Consortium led by Informed 365. This group consists of like-minded organisations whose primary purpose is to develop a shared modern slavery platform so all members can benefit from learnings from a much larger groups of suppliers.

To ensure the momentum gathered through successful completion of Year Two initiatives remains, further actions will be taken.

Leading up to the implementation of Informed 365, we will:

1. Develop a bridging strategy to record supplier data in preparation for launch of Informed 365
2. Enhance our training and education resources
3. Formalise a three-stage strategy to manage new and current suppliers
4. Develop off-system Supplier Management tools to support Informed 365
5. Formalise engagement with internal stakeholders to promote the wider element of social procurement
6. Develop an Action Plan to audit high risk suppliers and,
7. Audit our continuous suppliers and their contract status.

EFFECTIVE ASSESSMENT

The assessment of modern slavery risk is now business as usual, and a mandatory component of our risk management processes. On the completion of Year Three, the following measures will provide an assessment of the effectiveness of the initiatives.

These measures include:

- 1.** Risk Assessment Tool, Informed 365, will be operational.
 - a.** All continuous suppliers will have received their Assessment Questionnaire
 - b.** Data collected under the bridging strategy to fast-track questionnaires
- 2.** All members of genU's Senior Leadership Team will have completed Modern Slavery training, either as a refresher or as a first introduction.
- 3.** Enhance our Supplier Assessment Questionnaire and release to all new suppliers prior to set-up.
- 4.** Undertake a data cleaning project to improve supplier management capabilities and improve supplier response rates to questionnaires.
- 5.** Entrench Modern Slavery as a standing agenda item at relevant Committees and working groups to help establish content for relevant policy, procedure, and work instructions throughout genU.
- 6.** Documented audits of the Top 10 suppliers.
- 7.** Formalised contractual arrangement for the Top 20 continuous suppliers.

COLLABORATION

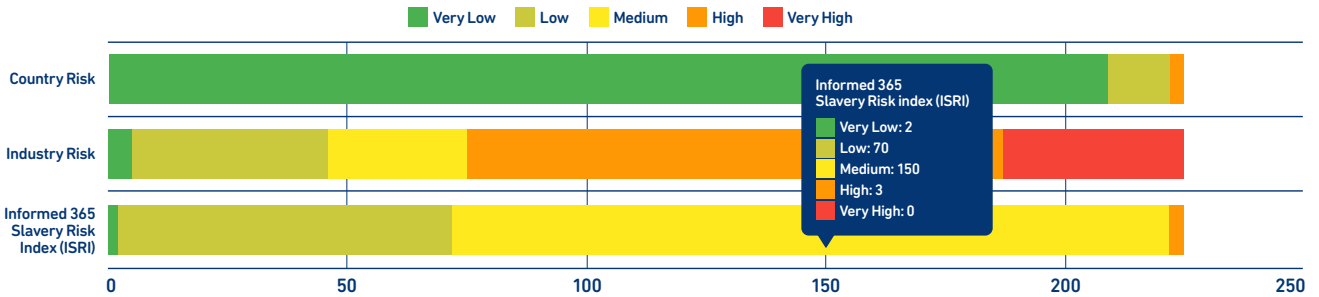
Through our partnership with Informed 365, we have been able to profile our top 225 suppliers who regularly supply goods and services to genU. The profiling was conducted on the three primary modern slavery risks of Country of Operations and Industry Sector of Operations using the GICS Codes as the benchmark.

In support of the following graphs, our risk profile can be summarised as:

- Very low based on the location of supplier operations
- High based on industry sector
- Overall, genU's level of risk to modern slavery is considered Medium.

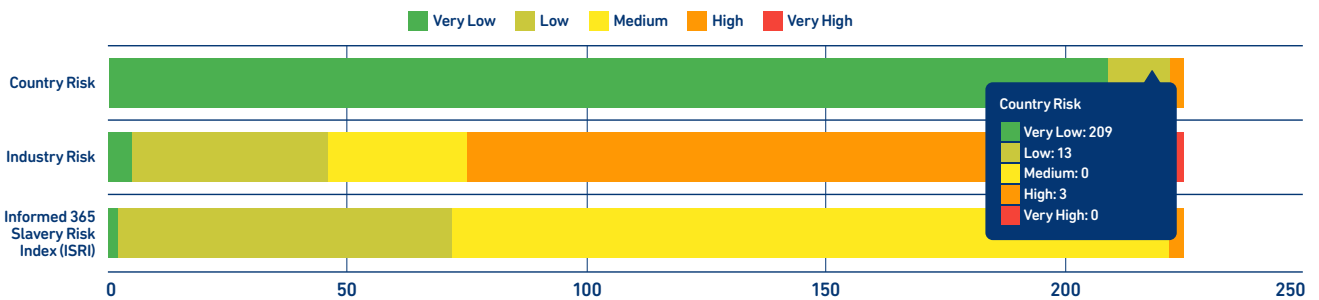
OVERALL RISK

Using the Informed 365 risk matrix, it is pleasing to see genU is not currently exposed to Very High risks of modern slavery. More so, we have very little risk exposure at either the top or bottom end of the scale, with 220 of the 225 suppliers profiled being considered Medium to Low risk of modern slavery activities.



COUNTRY RISK

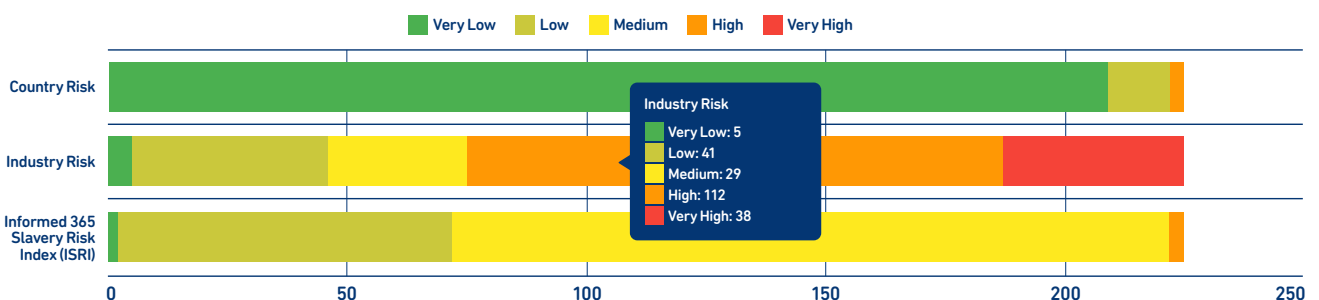
Fundamentally, genU tends to contract with suppliers who are based in Australia, with 222 of the 225 suppliers being at Low or Very Low risk. This reflects our policy objectives of supporting local jobs and overall commitment to our social procurement framework. The handful of suppliers who have overseas head office locations are limited to multi-national companies who provide telecommunication and insurance services.



INDUSTRY RISK

On the other hand, the relatively non-existence of risk based on Location is somewhat offset by our industry risk profile. 150, or two-thirds, of our suppliers provide us with goods and services from High to Very High industry risk categories, include IT equipment and employee uniforms. genU's risk profile aligns with global research. According to the 2018 Global Slavery Index, the biggest industry risks in Australia are:

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



LOCATIONS



genU Services

P 1300 558 368
genu.org.au

genU Support Hub

21-29 Reynolds Road
Highton, VIC 3216
PO BOX 558
Belmont, VIC 3216
P 03 5229 8733

genU Business Enterprises

77-79 Douro Street
North Geelong, VIC 3215
P 03 5277 2180
seasonscafe.com.au
theotwaykitchen.com.au

genU Training

P 1300 582 687
genutraining.org.au

St Laurence Park

90 Station Lake Road
Lara, VIC 3212
P 03 5282 1405

Barwarre Gardens

89 Barwarre Road
Marshall, VIC 3216
P 03 5249 0600

Pipsqueaks Early Learning Centre

34/38 Manzeene Ave
Lara, VIC 3212
P 03 5282 0000
pipsqueakselc.org.au

MatchWorks (Head Office)

21-29 Reynolds Road
Highton, VIC 3216
P 03 5229 8733
matchworks.com.au

IPA (Head Office)

Level 5, 350 Collins Street
Melbourne, VIC 3000
P 03 9252 2222
ipa.com.au

Eastern Hub

285A McKillop Street
East Geelong, VIC 3219
P 03 5249 6100
easternhub.org.au

WE EXIST TO SERVE ALL AMBITIONS; GREAT AND SMALL.

We don't see limitations, we see possibilities to be met boldly.

We believe in helping you achieve and grow your ambitions.

We are advocates, champions for our clients.

A voice for the vulnerable. Agents of change.

We are trusted advisors; experts.

We are coaches; mentoring, motivating,
strategically navigating the outcome map.

We are the support crew; steadfast
in support when times get tough.

Like us, our clients aren't
shrinking violets.

Our passion is infectious.

We're making the most of today
and might just surprise you with
where we can go.

We are for the people, the parents,
the children, the carers who have
ambitions for their life and the
lives of their loved ones.

We work tirelessly with families,
businesses and communities
to make inclusion a reality.

This is our intent.

This is our stance.

This is our purpose.

This is genU.





PHONE US
1300 558 368

genü



EMAIL
contact@genu.org.au



WEBSITE
genu.org.au

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ABN 74 614 366 031
ACN 614 366 031