

# Modern Slavery - Policy, Statement & Program

## 1. Context:

In January 2019 the Australian Government commenced the implementation of the [Modern Slavery Act 2018](#). This requires Government agencies, or companies that administer Government funding, to take reasonable steps to ensure that there is no modern slavery connected to the goods and services they procure. As a business with an annual consolidated revenue of at least \$100 million AUD, KinCare is required to comply with the Modern Slavery Reporting Requirement. This reporting assists KinCare to identify and address our modern slavery risks, and maintain responsible and transparent supply chains. As part of our reporting obligation, we are also required to prepare a Modern Slavery Statement. This statement sets out our actions to assess and address modern slavery risks in our business operations and supply chains.

## 2. Policy Purpose:

Modern Slavery is a crime and violation of human rights and is defined under the [Modern Slavery Act 2018](#) (the Act) as including eight types of serious exploitation:

- Trafficking in persons;
- Slavery; Servitude;
- Forced marriage;
- Forced labour;
- Debt bondage;
- Deceptive recruiting for labour or services; and
- the worst forms of child labour, which means situations where children are subjected to slavery or similar practices; or engaged in hazardous work.

The purpose of this policy is to:

- Prevent, detect and respond with mitigating controls to reduce the risk of Modern Slavery occurring within KinCare, its supply chain or in any other business relationships
- Ensure KinCare is compliant with the Act, and which may be amended within legislative requirements
- Demonstrate KinCare's commitment to partnering with businesses and those individuals that comply with the Act.

## 3. Policy Statement:

KinCare is strongly committed to ensuring its contributions to progress in human rights within all of its policies and procedures for all of their people, within its supply chain, and any other business stakeholder engagement in relation to modern slavery. KinCare takes and will continue to evolve its meaningful action to identify and address modern slavery within its business operations and governance. KinCare will set a standard of behaviour and values for all employees, supply chain, and any other business relationships, that align with its values, and diversity framework, as required to meet our Aged Care Quality Standards, and the Act.

## 4. Responsibilities and Delegations:

<b>This policy applies to:</b>	All KinCare Employees Supply Chain
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	Vendor/Procurement/Business relationships
<b>Specific responsibilities</b>	<p><b>Human Resources and Talent Teams</b> - To ensure that onboarding and overarching people policies and practices meet the obligations in mitigating Modern Slavery risks.</p> <p><b>Compliance and Enterprise Teams</b> - To ensure that our supply chain and vendor partnerships are managed according to KinCare’s Modern Slavery obligations.</p>
<b>Roles Responsible for Implementation</b>	Board Members Executive/Senior Leadership Team Members KinCare Leadership Team Members
<b>Roles permitted as a Signature of a Responsible Member</b>	Director Board Member Chief Executive Officer
<b>Approval Body</b>	Board and Executive/Senior Leadership Team
<b>Reporting Period</b>	1 July 2023 to 30 June 2024

## 5. Definitions:

**Employee:** means an employee, including a casual employee and contractors of KinCare.

**Modern Slavery:** as outlined in section 2 ‘Policy Purpose’ of this document.

**Modern Slavery Act:** means the [Modern Slavery Act 2018](#) and the future amendments to the Act.

**Operations:** means activities that are directly controlled by KinCare and its divisions/business units.

**Responsible Member:** means an individual that is appointed as a Director, Board Member or the Chief Executive Officer of KinCare.

**Supply Chain:** means a business, company, or sole trader that supplies KinCare with goods or services, and includes their officers, directors, subcontractors, agents, related entities and consultants.

**Vendor:** means a business, company, or sole trader that supplies KinCare with goods or services, and includes their officers, directors, subcontractors, agents, related entities and consultants.

## 6. Policy & Statement Program:

KinCare ensures that that all reasonable measures are taken to mitigate risks of Modern Slavery with the following measures

(a) Identity of the reporting entity	<p><b>KinCare Health Services Pty Ltd</b>  <b>ABN:</b>31095961005  <b>Address:</b> Level 4, 20 Lexington Drive, Bella Vista NSW 2153</p>
(b) Description of the structure of, operations and supply chains of the organisation	<p>KinCare Health Services Pty Ltd (<b>KinCare</b>) is a proprietary limited company which, during the reporting period, was owned by KinCare (Holdings) Pty Ltd ACN 095 958 857, a proprietary limited company in turn owned by MACDF TT Pty Ltd and KC Finance Pty Ltd.</p> <p>During the reporting period, KinCare did not have any subsidiaries, but did work closely with KinCare Management Pty Ltd ACN 095 961 032 to deliver aged care services, with KinCare</p>

	<p>Management Pty Ltd being an entity that employs many of the staff who deliver aged care services to KinCare. Together, KinCare and KinCare Management Pty Ltd had approximately 1,000 employees during the reporting period. KinCare Management Pty Ltd did not meet the revenue threshold to be required to lodge a separate Modern Slavery Statement and does not carry on business other than the employment of staff to work in KinCare’s business.</p> <p>KinCare delivers aged care services to clients based in various locations throughout Australia, particularly through the Commonwealth Home Support Program (CHSP) and through the delivery of Home Care Packages (HCP).</p> <p>KinCare’s supply chain includes direct sourcing of labour, as well as consumables, Personal Protective Equipment (PPE) and other goods and services as may be required to deliver aged care services to clients in Australia.</p> <p>KinCare assesses its ‘at risk’ supply chains as consisting of:</p> <ol style="list-style-type: none"> <li>1. Human Resources – through use of a Talent Acquisition partner; and</li> <li>2. Third party suppliers of consumables and Personal Protective Equipment (PPE) who may, in turn, have overseas suppliers.</li> </ol> <p>To mitigate these risks, KinCare sources its goods and services only from reputable vendors who also have their own Modern Slavery Statements in place, and this is a requirement of the Service Agreements in place between KinCare and its third party suppliers. In addition to this, KinCare’s internal policy which sets out supply chain requirements states that employees must, when engaging with third parties,:</p> <p>“Ensure that both parties have a valid and accepted Modern Slavery policy to ensure the abolishment of Modern Slavery practices.”</p> <p>Clauses in KinCare’s template service agreements relating to Modern Slavery are accepted by third parties and cannot be removed.</p>
<p>(c) Description of the risks of modern slavery practices in the operations and the supply chains of the reporting entity, and any entities that the reporting entity owns or controls</p>	<p><b>Human Resources - Talent Acquisition</b></p> <ul style="list-style-type: none"> <li>– Risk of directly employing workforce that are at risk of Modern Slavery as per the Act.</li> <li>– Risk of indirect contravention by the use of Talent Acquisition provider.</li> <li>– <b>Risk Assessment Rating:</b> LOW.</li> </ul> <p><b>Overseas Contract Manufacturing and Supply Chain from Local Sourcing partners</b></p> <ul style="list-style-type: none"> <li>– Risk of direct contravention by the manufacturing partner.</li> <li>– Risk of indirect contravention by a component supplier to our Local Sourcing partners.</li> <li>– <b>Risk Assessment Rating:</b> LOW.</li> </ul>
<p>(d) description of the actions taken by</p>	<p><b>Human Resources- Talent Acquisition</b></p>

<p>the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes</p>	<ul style="list-style-type: none"> <li>- The risk of modern slavery in our directly employed workforce is low. This is due to the highly regulated nature of our labour market in Australia, the strict regulation of aged care, the presence of unions to represent employees, and our employees undertaking work in environments where there are established industrial instruments, policies and processes.</li> </ul> <p><b>Overseas Contract Manufacturing and Supply Chain from Local Sourcing partners</b></p> <ul style="list-style-type: none"> <li>- All vendor agreements have a Modern Slavery clause to ensure that the following compliance requirements are met; <ul style="list-style-type: none"> <li>- adherence to the KinCare Modern Slavery policy - remediation action including termination and suspension for breach of the Act</li> <li>- providing KinCare the right to audit our vendors and their respective supply chains to review their compliance with the Act.</li> </ul> </li> <li>- KinCare requests vendors that are larger spend providers to submit evidence of their Modern Slavery Statements upon request or through our auditing process in alignment with the Aged Care Quality Standards as per Standard 8 - Organisational Governance.</li> </ul>
<p>(e) Description of how the reporting entity assesses the effectiveness of such actions</p>	<p>Compliance with the Modern Slavery Act is part of KinCare’s Quality Assurance and auditing requirements, in alignment with the Aged Care Quality Standards as per Standard 8 - Organisational Governance.</p> <p>KinCare monitors any escalations from this audit process and any other employees relating to its supply chain and has the right to audit and/or investigate third parties further, a right enshrined in KinCare’s template service agreements.</p> <p>A vendor review summary will be supplied annually to the Senior Leadership Team and Board to highlight a sample of vendors and supply chain efficacy meeting Modern Slavery compliance.</p> <p>Actions may also include;</p> <ul style="list-style-type: none"> <li>- Termination of vendor and/or supply chain agreements</li> <li>- Changing the choice of vendor and/or supply chain.</li> </ul>
<p>(f) Description of how the process with: (ii) any entities that the reporting entities owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14 - the entity giving the statement</p>	<p>KinCare Health Services Pty Ltd does not own any other entities.</p>
<p>(g) Other information</p>	<p>n/a</p>

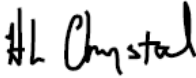
## 7. Escalation and Reporting:

- 7.1. All incidents are to be reported in line with the Hazard and Incident Management Policy and Procedures and events escalation framework.
- 7.2. All complaints are to be reported in line with the Complaints and Feedback Policy and Procedure.

## 8. Reporting Entities Signature of a Responsible Member:

This Statement has been approved by the Board of KinCare Health Services Pty Ltd in its capacity as principal governing body of KinCare Health Services Pty Ltd on 3 May 2025.

This Statement is signed by Haydn Chrystal in his role as Chair of KinCare Health Services Pty Ltd.

<b>Signature</b>	
<b>Date signed</b>	3 May 2025
<b>Role of Responsible Member</b>	Chair of KinCare Health Services Pty Ltd

## 9. Relevant Legislation:

- [Modern Slavery Act 2018](#)
- [Aged Care Act 1997](#)
- [Aged Care Quality and Safety Commission Act 2018](#)
- [Public Governance, Performance and Accountability Act 2013](#)

## 10. Relevant Standards:

Aged Care Quality Standard 6, 7, and 8.

## 11. Related Information:

<b>Related Policies:</b>	
Code of Conduct	Purchasing of Goods and Services
Equal Employment Opportunity	Diversity
Approved Provider and Regulatory Compliance	Compliance
Whistleblower	
<b>Related Procedures:</b>	
Diversity	Compliance
<b>Related User Guides:</b>	

<b>Related Work Instructions:</b>	
Centralised Onboarding and Offboarding Staff Management	
<b>Related Fact Sheets:</b>	
KinCare Vendor Types - Insurance/s & Compliance Requirements Matrix	
<b>Related Skill Assessments:</b>	
<b>Related Forms:</b>	
New Contractor/Vendor/Provider Request Form	
<b>Related Training:</b>	

## 12. Version History:

Version	Effective Date	Brief Summary of Change/s	Policy Owner	Approved By
1.0	28/06/2022	Document Created	Chief Human Resources Officer (CHRO)	Senior Leadership Team Quality & Clinical Governance Committee (Q&CGC)
1.1	24/05/2023	Document revised	CHRO	Q&CGC
1.2	28/08/2024	Document moved to new template, reviewed and updated.	CHRO	CEO