

Modern Slavery Statement

For the year ended 30 June 2021



MODERN SLAVERY STATEMENT ACTIV FOUNDATION INCORPORATED FOR THE YEAR ENDED 30 JUNE 2021

Introduction

This is the second Modern Slavery Statement (“Statement”) for Activ Foundation Incorporated (“Activ”), as Activ is required to comply with the *Modern Slavery Act 2018* (Cth) (“Act”). Activ’s first Modern Slavery Statement was submitted to the Regulator on the 30th of March 2021. This Statement covers the reporting period from 1 July 2020 to 30 June 2021 (“FY21”). The term ‘Modern Slavery’ in this statement has the same meaning given in the Act.

Activ understands the importance of its customers, employees and the broader communities in which it works and wishes to ensure that its service delivery and business practices are ethical and sustainable.

Activ recognises its role and responsibility to seek to safeguard the human rights of its customers who live with intellectual disability. It is entirely consistent with that focus for Activ to recognise and take steps to safeguard the human rights of the people who participate in its supply chain. This Statement explains what Activ is doing to address Modern Slavery risks in its operations and supply chain.

Our Structure

Activ is a Western Australian not-for-profit organisation incorporated under the *Associations Incorporations Act 2015* (WA). Activ did not have any active subsidiary entities in FY21.

Activ has been supporting people living with disability since 1951 and is a leading provider of individualised services for people living with intellectual disability in Western Australia.

The Board of Directors is the ultimate decision-making body of Activ and is responsible for its overall governance. The Board delegates day-to-day operational management and decision-making to the Executive team.

The Chief Executive Officer has responsibility for oversight of Activ’s risk and compliance obligations, including in relation to Modern Slavery reporting.

Our Operations

Activ works across Western Australia to enable people living with disability to pursue the life they choose. We deliver services and provide support at over 100 locations to people in the greater Perth Metropolitan area as well as in Albany, Geraldton, Kalgoorlie and the South West region. Activ has no operations outside of Western Australia.

Activ has approximately 2,500 employees and volunteers and supports around 1,800 individuals living with intellectual disability and their families. Our strategy is to deliver proven pathways to independence for people living with intellectual disability.

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We support people to live their own lives, set new goals and reach new milestones through services, including:

- Permanent and short-term accommodation
- Community Support and Engagement
- Employment
- Education & Training
- Behaviour Support

We provide meaningful employment to more than 1,000 people living with disability across metropolitan and regional Western Australia through our Employment Services, Property Care and Administrative businesses. Supported employees have opportunities to be part of a commercial operation and to develop skills in diverse areas such as:

- Timber manufacturing
- Product packaging
- Industrial services
- Property care and horticulture
- Administration

Our Policies

Activ's Code of Conduct and Ethics (the "Code") sets the expectations for how Activ's people live and breathe the organisation's values and meet its aims and responsibilities as a disability services provider.

The Code applies to everyone – staff, employees, volunteers, work experience placements, managers, Directors of Activ and contractors – and sets a clear standard of what we expect in Activ-related activities. Activ's Code provides a practical set of requirements to help staff make decisions in their day-to-day work and outlines what is expected of, and the rights of, staff while working at Activ.

Activ has in place a suite of operational policies, of which all of them ultimately have an objective of ensuring that universally recognised human rights are safeguarded. Activ also has a Modern Slavery Policy and Supplier Code of Conduct in place to further support the recognition of human rights and safeguards.

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Our Suppliers

To support and facilitate its operations Activ purchases both goods and services from third party suppliers worldwide.

The goods Activ purchases include:

- Goods that are purchased to be transformed and then sold to customers, such as timber for Activ's timber manufacturing operations which is used to produce items such as pallets, crates and furniture.
- Goods that are purchased for use in providing services, such as 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 Activ 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.

While Activ purchases from suppliers who are based in Australia and overseas, its suppliers are predominately located in Australia and are Australian owned and operated and so are generally less likely to engage in practices that would constitute Modern Slavery. Activ has assessed that it purchases from its suppliers who operate in sectors, and supply goods and services, that on the whole present a lower Modern Slavery risk.

Actions to Assess and Address Modern Slavery Risks

For the FY20 reporting period Activ had formed a Modern Slavery Working Group ("MSWG") to oversee the creation of Activ's first Modern Slavery Statement. Since then this function moved to the Governance & Risk ("G&R") department to commence with the embedding of the Modern Slavery mitigation strategies throughout the organisation.

Supply Chain Scoping

G&R assessed Activ's supply chain by identifying all suppliers, their location and the value of spend during FY21. Activ applied a risk-based approach to assessing the identified group of suppliers. There were 29 Australian based suppliers (who represent over 63% of our annual expenditure) surveyed for the risk of their exposure to Modern Slavery practices. Activ did not survey suppliers that have a Modern Slavery Statement available on the regulator's (Australian Border Force) website.

The survey focused on the supplier's Modern Slavery reporting requirements, policies and procedures, identification and mitigation of risk, employee awareness and training, supply chain exposure, HR/IR recruitment practices and overall compliance with the Act.

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Risk Assessment

A detailed review of the responses from our suppliers or their publicly available statements was conducted by G&R. Most Australian suppliers are specialised providers requiring highly skilled staff who are therefore likely to be well paid and have good working conditions, and we have assessed them as having a lower risk of Modern Slavery practices. International providers were mostly unaware of the Australian legislative requirements. Through our engagement we have increased these suppliers' awareness of their responsibilities and we are working in partnership with these suppliers to help them understand their obligations. This has formed part of our mitigation steps to reduce any risk of Modern Slavery practices.

Mitigation Steps

Of those suppliers who responded to our survey or whose Modern Slavery statements we have reviewed, no Modern Slavery risks were identified that would warrant mitigation steps.

We will continue to follow up on the suppliers that did not respond to our survey or for whom we have been unable to identify and review Modern Slavery statements. As a mitigation step Activ is committed to suspending any further services from a particular supplier if we identify for that supplier any specific potential risks of exposures to Modern Slavery practises. Activ will also work with unresponsive organisations to ensure they understand their responsibilities towards Modern Slavery.

From the knowledge Activ has gained and risk assessment steps we have undertaken, Activ has taken several steps to manage its risk by:

- ongoing monitoring of Modern Slavery practices by G&R;
- requesting suppliers to complete a survey to identify any modern slavery risks;
- reviewing each Modern Slavery Statement relevant to our supply chain on the regulator's website;
- ongoing assessment of the risk of modern slavery practices within Activ's supply chain; and
- embedding the Supplier Code of Conduct that will assist suppliers to understand the Modern Slavery practices they should apply in their own operations and supply chain and any matters they should report to Activ.

Measuring Effectiveness

Activ's focus for its second Modern Slavery reporting period has been to better embed Modern Slavery Awareness within our supply chains and operations.

Activ is committed to when any instances of Modern Slavery are detected in its operations or supply chain, to document and record such cases, prioritise investigation, remedy the situation and undertake corrective actions.

In FY21 Activ increased the Modern Slavery review of its suppliers to 63% of overall expenditure (compared with 60% in 2020).

In addition, Activ will review on a periodic basis its relevant policies and procedures through the lens of seeking to effectively mitigate Modern Slavery risks.

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Awareness and Training

To ensure organisation-wide understanding of the Modern Slavery risks within our operations and supply chains, Activ has developed the following training:

- New Staff - Orientation materials which include information on the basic principles of Modern Slavery and Activ's Policy for mitigation of Modern Slavery exposure and risk. This information has been included in the "NDIS Requirements – Our Policies and Procedures" online training modules for new staff;
- Existing staff - Various communications outlining Modern Slavery and Activ's Policy for mitigation of Modern Slavery exposure and risk; and
- Key Purchasing & Supply Management Relevant Staff – Create better awareness on the importance of adherence to the Supplier Code of Conduct and Activ's legal requirements to identify potential risks and mitigate exposure to Modern Slavery practices.

Next Steps

Activ acknowledges that Modern Slavery risk management is a continuous process.

Activ is committed to ensuring that the organisation understands its legal requirements to identify potential Modern Slavery risks and mitigate them, and as part of this, Activ will continuously:

- embed internal modern slavery specific policies in combination with existing policies;
- continuously assess suppliers on modern slavery practises to minimise and mitigate related risks;
- embed the Activ Supplier Code of Conduct;
- consider changes to Activ's tendering process and contractual requirements in its contracts with suppliers; and
- create awareness of what Modern Slavery means and how to report a modern slavery practice that has been identified.

This statement was approved on 29 December 2021 by Activ's Board of Directors.



Michael Heath
Chief Executive Officer
Activ Foundation Inc.

29 December 2021