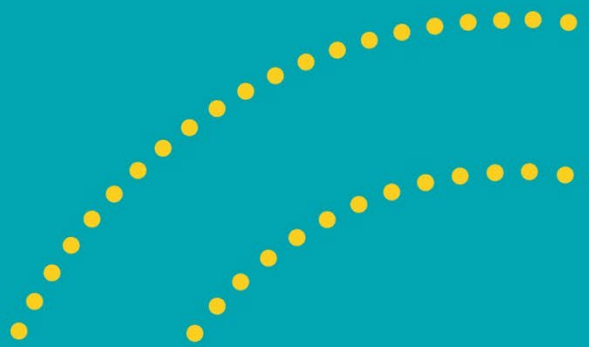




# MODERN SLAVERY STATEMENT

2022-2023



# INTRODUCTION

integratedliving Australia Limited (“integratedliving”) (ABN 93 130 530 844) is committed to supporting the Australian government's national response to modern slavery and implementing a meaningful response to minimise the risks of such within our operations and supply chains.

This is the first Modern Slavery Statement prepared and submitted by integratedliving in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) (“the Act”).



## ABOUT US

### Our vision

Better health and wellbeing outcomes for regional, rural and remote communities.

### Our purpose

We are passionate about supporting people in regional, rural and remote communities to achieve their highest quality of life through access to equitable, affordable, timely, safe, responsive and inclusive care and health services in their homes.

### Our services



Help at home



Health services



Exercise



Social support and respite care



Wellness for Independence® programs

### Our values



Diversity



Integrity



Respect



Unity



Equity

# STRUCTURE, OPERATIONS & SUPPLY CHAIN

## Structure and operations

integratedliving is a registered company limited by guarantee, incorporated under the Corporations Act 2001 (Cth) and is a registered charity with the Australian Charities and Not-for-profits Commission.

integratedliving wholly owns and controls Hunter Integrated Care Incorporated (ABN 89 586 456 344), an incorporated association registered under the Associations Incorporations Act 2009 (NSW) also registered as a charity. Hunter Integrated Care Incorporated's primary objective is to manage a Reserve Trust for the benefit of the Upper Hunter community. Hunter Integrated Care Incorporated does not meet the definition of a reporting entity under the Modern Slavery Act, and does not employ staff and rather, as a wholly owned subsidiary, utilises integratedliving's staff and supply chain to deliver its objectives.

integratedliving is governed by an independent Board of Directors. The Chief Executive Officer, supported by the Executive Leadership Team, are responsible for the management and administration of integratedliving in line with all applicable laws and regulations, and the Board's strategic plan.

integratedliving's registered office is in Muswellbrook, New South Wales, and we employ over 1,100 staff to provide health services to clients throughout regional, rural, and remote communities in 6 States/Territories of Australia.



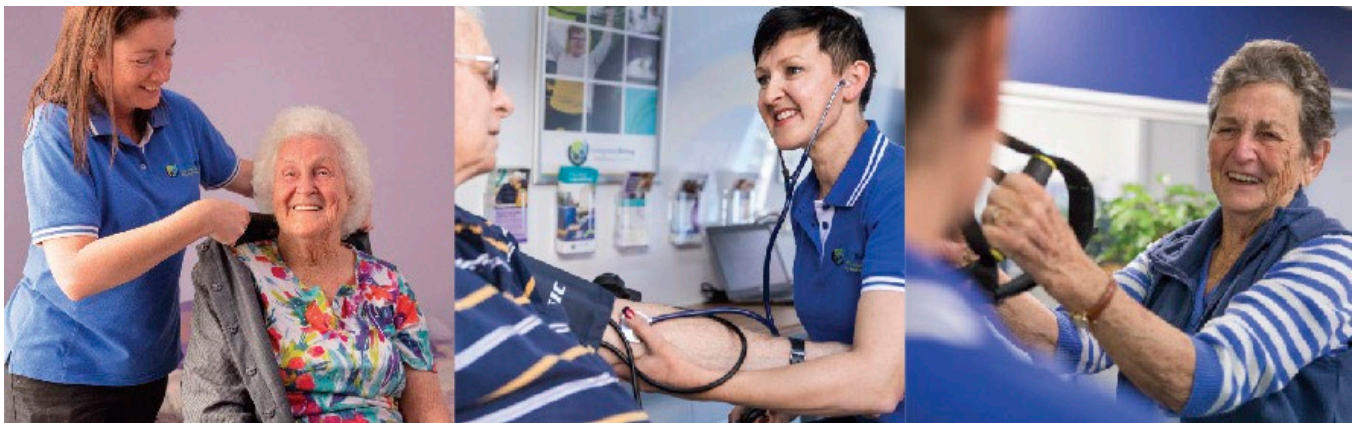
**1,136**  
EMPLOYEES



**28,324**  
CLIENTS

integratedliving provides home and flexible care services to older Australians, funded by the Australian Government, under the Commonwealth Home Support Programme, Home Care Packages Programme and Short-Term Restorative Care Programme, and other health care services funded privately or via State or Federal governments.

integrated living services include:



<b>Help at home</b>	Services include meal delivery, home upkeep, personal care, transport, home modification, aids and sensors and medication support.
<b>Health services</b>	Our team of nurses, dietitians, psychologists, social workers, occupational therapists, physiotherapists, podiatrists and health coaches provide speciality health and wellbeing services.
<b>Exercise</b>	Our Wellness Centres, exercise physiology services and movement classes help people improve their strength, balance and mobility.
<b>Social support and respite care</b>	Helping clients stay socially connected and providing respite support for those who care for others. Activity Centres, home visits, social support calls, respite care social sessions and our popular Digital Dialogue program are some of the many ways we help keep people connected in their communities.
<b>Wellness for Independence® programs</b>	A range of programs designed to help you be proactive with your health and wellbeing. Covering memory, cardiac, digital, nutritional, respiratory, diabetes, feet, low vision, palliative approach, mind and body and falls prevention.

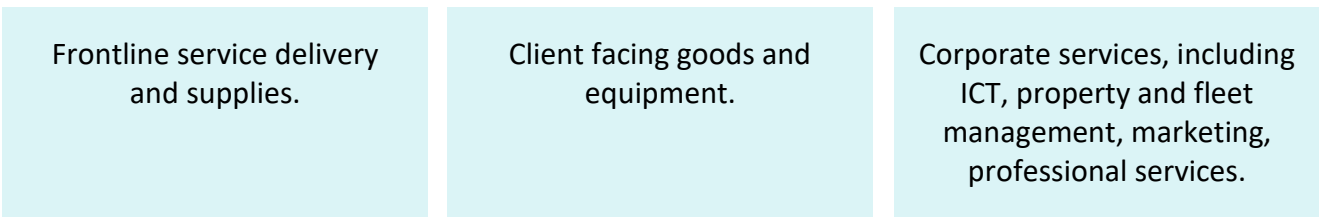


# Executive Structure



## Supply Chain

integratedliving’s supply chain includes the provision of goods and services for:



integratedliving recognise that the provision of any goods or services from external sources carry a risk of modern slavery practices.

In the 2023 financial year, integratedliving procured goods or services from approximately 2,267 suppliers, spending a total of approximately \$46.3 million (excluding GST).

## RISKS OF MODERN SLAVERY

integratedliving’s Modern Slavery Policy outlines its continuous improvement approach and processes to identifying, and responding effectively to, risks of modern slavery.

In 2023, integratedliving conducted a risk assessment for the risk of exploitive practices using a pragmatic, reasonable methodology using the product category as the primary data point against which to make a base-level identification of modern slavery risk, which identifies 76 sub-categories of supply type of the three types of goods or services procured.

Thereafter, those sub-categories were reviewed against the following categories to consider where integratedliving could, via its supply chain, cause, contribute and/or be directly linked to modern slavery practices:

- Sector and industry risks.
- Product and services risk.
- Geographic risks.
- Supply chain model risks.

integratedliving’s suppliers of a small number of goods/service categories (nine) were identified as high risk due to supply chain model risks, namely goods made overseas that are generic are in

nature and may be subject to contract manufacturing, and sector and industry risks arising from goods made overseas in developing or other countries with a higher modern slavery risk in the garment, rare earth, or raw material industries.

An additional 35 sub-categories of integratedliving's supply of other client facing goods and equipment, frontline service delivery and supplies, and corporate services categories were identified as a at lower risk of modern slavery practices, due to primarily risks of low skilled labour onshore or goods which may originate from overseas but generally made by specialist manufacturers.

Whilst these sub-categories of supply were identified, the overall risk of integratedliving causing or contributing to modern slavery practices is low.

# ACTIONS TAKEN

integratedliving’s Modern Slavery Policy recognises that to implement a meaningful modern slavery response that is achievable and within the bounds of its resources available, a shorter, medium, and longer term action plan has been established.

Actions taken to date include:

- Review of the Modern Slavery laws and guidance documentation available.
- Development of a Modern Slavery Policy.
- Development of an Action Plan to meet integratedliving’s short term obligations (as the first year of application of the Modern Slavery Act to integratedliving) and the medium and longer term actions to continue to identify and address risks of modern slavery practices in our operations and supply chains.
- Established a working group to drive actions.
- Processes implemented to meet reporting requirements of the Modern Slavery Act.

Framework/Policy	Purpose
Modern Slavery Policy	Outlines the requirements and application of the Modern Slavery Act 2018 to the operations of integratedliving Australia Limited, and integratedliving's commitment to implementing a meaningful modern slavery response.
integratedliving Governance Structure	The framework and structure to delegate responsibilities of the Board of Directors across the organisation to efficiently support the Board in meeting its accountabilities under its governing legislation and regulation, including compliance with applicable laws such as the Modern Slavery Act 2018.
Code of Conduct	Recognises integratedliving’s commitment to our team members, clients and our communities and sets the expectations and requirements of all team members working at integratedliving as to appropriate conduct and professional behaviour and the expectation of a commitment to the highest levels of integrity and ethical standards in all our business and work practices.
Enterprise Risk Management Framework	integratedliving is committed to protecting the organisation, our clients, workforce, and others, from situations or events that would prevent achieving strategic goals and objectives through effective risk management as an integral part of good management practice and the provision of safe workplace environments.
Quality Policy	Provides an overarching view of integratedliving’s commitment to a Quality Framework that incorporates ongoing review and improvement of its practices and underpins the organisation’s Strategic Plan.
Whistle blower	Outlines the process for the reporting of reportable conduct and have their interests protected.
Investment Management Policy	Outlines the governance expectations of integratedliving in managing it’s financial investments including that such investments must be ethically and socially responsible.

# EFFECTIVENESS OF ACTIONS

Whilst our initial risk assessment indicates that the overall risk of integratedliving causing or contributing to modern slavery practices is low, integratedliving’s Action Plan outlines it’s plans to continue to conduct due diligence, and additional remediation processes, in response to identified areas of risk to be undertaken in the 2024 financial year:

Mitigate
<ul style="list-style-type: none"><li>• Create a Supplier Code of Conduct, addressing corporate social responsibility and ethical business practices including elimination of modern slavery.</li><li>• Build modern slavery and other sustainable procurement considerations for high-risk categories into the sourcing evaluation/decision-making process.</li><li>• Incorporate code of conduct and modern slavery into standard contract templates.</li><li>• Update Procurement and Purchasing Policy to address modern slavery and other sustainable procurement considerations.</li><li>• Develop and implement modern slavery learning and development MedeHealth Guide.</li><li>• Newsletter communications to raise awareness across the organisation of modern slavery risks.</li></ul>
Remediate
<ul style="list-style-type: none"><li>• Investigate and create plan to conduct due diligence over high-risk suppliers/categories by a third party agency or supplier attestations.</li><li>• Develop processes for remedial action in the case of any adverse findings.</li><li>• Implement a notification process for employees who identify risks or instances of modern slavery practices.</li></ul>

# CONSULTATION

As outlined in Structure and Operations, integratedliving wholly owns and controls Hunter Integrated Care Incorporated, however it does not employ staff or procure in and of itself and rather, as a wholly owned subsidiary, utilises integratedliving’s staff and supply chain to deliver its objectives and is governed by a majority of like Directors.

Our Executive Leadership and Board of Directors are briefed as to the status of integratedliving’s Modern Slavery Action Plan and in the development of this Statement.



# PRINCIPAL GOVERNING BODY APPROVAL

This Modern Slavery Statement was approved by the principal governing body of integratedliving Australia Limited, as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 29 November 2023.

## Signature of responsible member

This Modern Slavery Statement is signed by a *responsible* member of integratedliving Australia Limited Board of Directors as defined by the Act:



Dr Vanda Fortunato (Chair of Board)

## Mandatory criteria

The page number/s of integratedliving Australia Limited’s statement that addresses each of the mandatory criteria in Section 16 of the Act is as follows:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	2
b) Describe the reporting entity’s structure, operations, and supply chain.	3
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	5
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address the risks, including due diligence and remediation processes.	7
e) Describe how the reporting entity assesses the effectiveness of these actions.	8
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	8