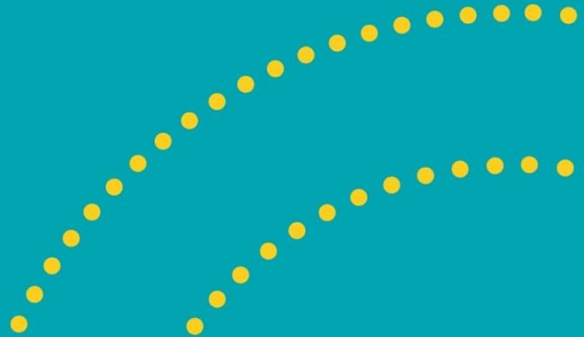




MODERN SLAVERY STATEMENT

2023-24



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 integratedliving’s second Modern Slavery Statement prepared and submitted 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 1,000 staff to provide health services to clients throughout regional, rural, and remote communities in six States/Territories of Australia.



1,086
EMPLOYEES



25,877
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:

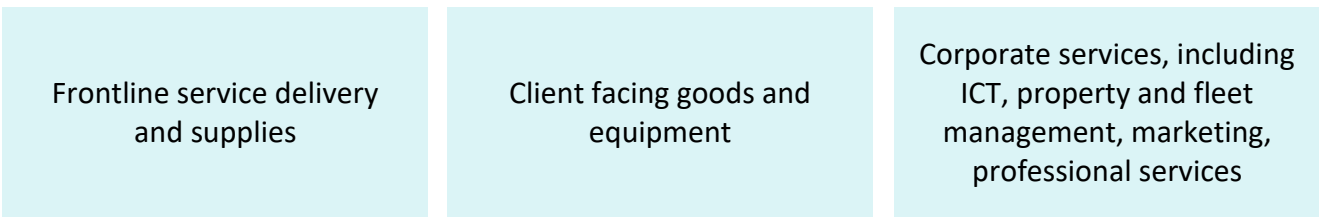
Help at home	Services include meal delivery, home upkeep, personal care, transport, home modification, aids and sensors and medication support.
Health services	Our team of nurses, dietitians, psychologists, social workers, occupational therapists, physiotherapists, podiatrists and health coaches provide speciality health and wellbeing services.
Exercise	Our Wellness Centres, exercise physiology services and movement classes help people improve their strength, balance and mobility.
Social support and respite care	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.
Wellness for Independence® programs	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.





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 2023-24 financial year, integratedliving procured goods or services from approximately 2,000 suppliers, spending a total of approximately \$39.7 million (excluding GST).

RISKS OF MODERN SLAVERY

integratedliving remains committed to its continuous improvement approach and process, outlined in its Modern Slavery Policy, to identify, and respond effectively to, risks of modern slavery.

With no significant change to the supply chain or operations of integratedliving, the overall risk of integratedliving causing or contributing to modern slavery practices is low and remains a supply chain and sector/industry-based risk, arising from the procurement of goods made:

- overseas that are generic are in nature and may be subject to contract manufacturing; or
- overseas in developing or other countries with a higher modern slavery risk in the garment, rare earth, or raw material industries.

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.

In the 2023-24 reporting period, integratedliving progressed its Modern Slavery Action Plan, developed to continue to identify and address risks of modern slavery practices and have undertaken the following actions:

- Partnered with Ethixbase360 and configured the platform to conduct background screening of suppliers in integratedliving's higher risk supply categories and have prepared a modern slavery questionnaire to be issued to any identified high-risk suppliers.
- Built modern slavery criteria into our tender processes for larger contracts.
- Published a Modern Slavery Supplier Code of Conduct.
- Drafted clauses for contracts with suppliers that set our expectation that they are not to cause or contribute to modern slavery and must take action to identify and respond to risks of modern slavery within their own supply chain.
- Built awareness within the organisation as to the risks and prevalence of modern slavery through mandatory training.

Some actions planned for the 2023-24 reporting period were deferred to the 2024-25 reporting period to ensure we could appropriately resource the actions.

Actions undertaken in the prior reporting period (2022-23 financial year) included:

- 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.

integratedliving continues to maintain the following suite of policy that set our expectations around ethical and responsible conduct and provide for the escalation of risks of modern slavery:

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 its financial investments including that such investments must be ethically and socially responsible.

EFFECTIVENESS OF ACTIONS

Whilst recognising that the process of developing approaches to assessing and addressing the risks of modern slavery take time, we consider our efforts to do so effective if we continue to increase awareness of the risks and occurrence of modern slavery, whether we identify risks of modern slavery in our operations and supply chains, and if we do, our remediation response.

Our efforts in 2023-24 have focussed on progressing actions to raise awareness and implement robust processes to conduct due diligence over our supply chain. Whilst impossible to fully mitigate the risk, we continue to strengthen our due diligence processes and consider our actions taken to date have been progressive in effectively demonstrating our overall approach to assessing and addressing the risks of modern slavery.

There has been an increasing maturity in the understanding and appreciation of our social and ethical responsibilities as a corporate citizen, both in the procurement of goods and services, and the expectations on us in the supply of our services to other organisations as to modern slavery responsibilities and management.

Our Human Rights and Modern Slavery mandatory training achieved a 99.68% completion rate across our workforce, with positive feedback as to the increased awareness:

“A subject that is rarely talked about in Australia, but by this content, it appears to be just as relevant here as anywhere else”

“This is a good reminder that modern slavery exists. I was surprised by the statistics on how globally it is so prevalent”

“Sad to think this practice continues. Important to appreciate that it applies to the supply chain”

To continue to improve, and assess the effectiveness of, our actions in response to risks of modern slavery, our 2024-25 Action Plan includes the following:

Mitigate
<ul style="list-style-type: none">• Implementing the clauses in contracts with suppliers that set our expectation that they are not to cause or contribute to modern slavery and must take action to identify and respond to risks of modern slavery within their own supply chain.• Issue questionnaires to identified higher risk suppliers to assess for risks of modern slavery in our supply chain.• Updating procurement and other policy to address considerations going to risks of modern slavery.• Continued efforts to increase and maintain awareness (e.g., mandatory training, newsletter articles, etc).

Remediate

- Develop processes for remedial action in the case of any adverse findings.
- Implement a notification process for employees who identify risks or instances of modern slavery practices.

CONSULTATION

As outlined in Structure and Operations, integratedliving wholly owns and controls Hunter Integrated Care Incorporated, however that entity 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.

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 12 December 2024.

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.	6
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).	9