

# Modern Slavery Statement

Financial Year 2023/2024

## 1. About Medenterprises

Medenterprises International Limited is a New Zealand based entity providing recruitment services to the medical and healthcare industry.

Medrecruit International Limited Partnership and Medrecruit Trading AU Pty Ltd are the Australian subsidiaries of Medenterprises International Limited operating in Australia. Medrecruit International Limited Partnership has a General Partner, Medrecruit Pty Ltd.

This statement is being made on behalf of Medenterprises International Limited for the financial year July 2023 to June 2024.

## 2. Structure, operations and supply chain

### Structure

Medenterprises employs 106 permanent employees in Australia and 80 in New Zealand, with 41 contracted employees in the Philippines. There are also between 500 and 800 on-hire employees on a placement in any one day. There are offices located in Robina, Queensland, Queenstown, New Zealand and Auckland, New Zealand.

### Operations

The core services that Medenterprises delivers are:

- Medical Doctor Labour on-hire services, and
- Medical Doctor Permanent and short term recruitment services.

### Supply Chain

As primarily a “people business”, Medenterprises is heavily dependent on the services provided by its permanent and Medical Doctor on-hire employees to deliver services to our clients. Medenterprises engages a limited number of suppliers to support the delivery of services to clients.

Suppliers are categorised as follows: Technology, Insurance, Professional Advisor, Employment, Travel, Tenancy and Communication.

### 3. Modern slavery risks

Medenterprises has identified the following areas of modern slavery risk.

#### Purchase of Products (LOW)

Medenterprises uses local suppliers (Australia and New Zealand) or those with a global presence. Suppliers used are mostly suppliers of services and very few products are purchased. However, as in any business, the organisation does purchase laptops and electronic equipment which are known to be sourced from high-risk countries. The supplier of these laptops and equipment reports a Modern Slavery Statement annually to the Attorney-Generals Department.

#### Forced Labour (LOW)

Forced labour predominantly occurs in high-risk industries of which cleaning is one. Medenterprises uses three suppliers to clean offices in Queenstown and Auckland, New Zealand and Robina, Australia. There have been no concerns noted with either of these suppliers.

#### Remote Workers (LOW)

Medenterprises employs a number of people in the Philippines through a third party outsourced provider. The Philippines is ranked at 36 out of 160 countries based on the Global Slavery Index 2023 for having the highest prevalence rates of modern slavery (Walkfree). The supplier is an Australian based company that reports a Modern Slavery Statement to the Attorney-Generals Department on an annual basis.

#### Deceptive Recruitment Practices (LOW)

Medenterprises places doctors into locum positions in hospitals. These positions are high paying, requiring many years of education and experience and are placed through matching client needs with that of the doctor. These types of positions do not meet the criteria where people are performing low wage jobs through coercion that underpins a forced labour risk.

### 4. Actions taken to assess and address modern slavery risks

#### Policies

Medenterprises has the following foundational policies in place that guide employee behaviour, outline expected ethical standards and provide channels for reporting potential areas of risk and non-compliance.

Policies are reviewed on a regular basis to ensure they remain relevant and aligned with evolving best practices and legal requirements.

Employees are required to review these policies prior to commencement with the organisation. They are required to electronically sign that they have read, understood and will abide by the Code of Conduct.

Code of Conduct	The Code of Conduct sets out what Medenterprises expects from every person working for the organisation regardless of location, and confirms its commitment to its employees, business partners and stakeholders. The Code provides a working guide for employees to do the right thing when making decisions in their daily activities.
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Resolving Employment Relationship Problems	This policy establishes a framework and process for managing problems that may occur in the workplace, such as personal grievances including harassment, discrimination and unfair treatment, and performance disputes.
Protected Disclosures	This policy outlines the process for facilitating and investigating serious wrongdoing, corporate crime and misconduct and protecting the employees who made the disclosures.
Fit and Proper Policy	This policy outlines how to ensure that employees are “fit and proper”, i.e. employees have the required knowledge, skills and experience to discharge their role adequately and effectively and that they are of good character.

In addition to these foundational policies, Medenterprises has published a Modern Slavery Policy, created an in-house modern slavery training module and included questions related to modern slavery in their Supplier Due Diligence Questionnaire.

### **Building human rights knowledge and capabilities**

The Chief Risk Officer and Head of Risk and Compliance undertake self-training each year to become more aware of modern slavery practices and how the organisation could be involved in supporting the prevention of those practices. All employees in the Executive and Senior Leadership Teams (i.e. the decision makers in the organisation) are required to review the policy and undertake the in-house training module.

### **On-hire labour engagement**

All on-hire labour employees are medically qualified and engaged in work that has high expectations of ethical and professional behaviour. All on-hire labour employees are rigidly credentialed prior to any placement of work being commenced. Examples of credentials required are: 100 points of ID, right to work, working with children check, national crime check, medical registration number and at least 2 references.

### **RCSA membership**

Medenterprises actively leverages its membership in the Recruitment, Consulting & Staffing Association who provide valuable resources and materials that address industry specific risk and compliance concerns. Medenterprises receives and reviews updates, insights and guidelines allowing the organisation to strengthen its compliance measures and address modern slavery risks.

### **Supplier engagement**

Medenterprises ensures appropriate due diligence is undertaken when sourcing new suppliers supported by a Supplier Due Diligence Questionnaire and ensuring that all new supplier contracts include clauses committing to reducing the risks of modern slavery. A review of the Modern Slavery Register revealed that approximately 1/3 of Medenterprises suppliers are currently reporting modern slavery statements to the Attorney-Generals Department.

### **Customer engagement**

Medenterprises actively responds to all requests from clients to participate in surveys about how modern slavery risk is being addressed within the organisation.

## **5. Assessing the effectiveness of actions**

Medenterprises has not received any complaints nor had cause to investigate any report of modern slavery practices. There have been no terminations of employees as a result of non-compliance with the above policies. On-hire labour engagement processes are audited annually as part of the ISO9001 accreditation that was confirmed in August 2024 for the past financial year.

Medenterprises has a culture of continuous improvement and recognises that there is room for improvement in this space. In this current financial year, further controls to address modern slavery will be rolled out that will encompass supplier assessments, assurance testing and KPIs to monitor compliance.

## 6. Consultation

Medenterprises has an Executive Leadership Team that meets on a weekly basis to discuss and address material issues that impact the organisation.

In preparing this statement the executive leadership team, along with key functional support employees, were consulted to ensure the statement appropriately reflects the practices of the organisation.

This statement has been approved by the Board of Directors of Medenterprises International Limited.

## 7. Any other information

Nil



Richard Clark, Director

Medenterprises International Limited