



Activ Foundation Limited

Modern Slavery Statement

FY24

Activ is a not-for-profit organisation, which was reportable initially under the Associations Incorporation Act 2015 (WA) for the FY24 period, up until the 16 February 2024, when Activ transferred to a Public Company Limited by Guarantee and was reportable under the Corporations Act for the remainder of the Financial Year.

This statement was approved by the Board of Directors* (*"Karingal St Laurence Limited trading as genU"*), on the 18th November 2024, in their capacity as principal governing body of "Activ Foundation Limited" as at 1 July 2024, to meet the requirements of the Modern Slavery Act 2018 (Cth) for the reporting period 1 July 2023 to 30 June 2024 (FY24).

**Note: Post reporting period (1 July 2024) Activ merged with Karingal St Laurence Limited Trading as genU and Activ's Board of Directors was disbanded and governance was transferred to genU.*

Trevor Hunt
Director of Activ Foundation Limited.
24 November 2024

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“Activ acknowledges the Traditional Owners of Country throughout Western Australia and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures; and to elders past, present and emerging.”

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Introduction

Activ Foundation Limited (“Activ”) has developed this Modern Slavery Statement (“Statement”) in line with the Modern Slavery Act (2018) (Cth) (“Act”) requirements.

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.

We expect our suppliers to meet legislative requirements and applicable international requirements for workers’ welfare and conditions of employment. We aim to ensure that our suppliers apply these standards within their operations and their own supply chains.

This statement outlines the actions undertaken by Activ to identify and address any Modern Slavery risks in Activ operations and/or supply chains during the reporting period 1 July 2023 to 30 June 2024.

Our Reporting Structure & Organisation

Activ is a Western Australian not-for-profit organisation who has been supporting people living with a disability since 1951.

Activ was an incorporated association (ABN 11 553 592 765), incorporated under the Associations Incorporation Act 2015 (WA) until 16 February 2024, at which time it transferred to a Public Company Limited by Guarantee. Activ’s ABN remains unchanged. Activ’s ACN is 060 921 271.

During this statement’s reporting period Activ did not own, or control, any other entities during this period and therefore this criterion is not applicable.

Activ is registered to comply with the Australian Charities and Not for Profits Commission Act 2012 (ACNC) and NDIS Quality and Safeguards Commission – Practice Standards.

Activ is a leading provider of individualised services for people living with disability in Western Australia with its purpose to offer people with disability opportunities to enjoy full participation in their community, and to empower them to pursue the life they choose.

For the FY24 period, the Activ Board of Directors were the ultimate decision-making body of Activ and were responsible for its overall governance. The Board delegated its day-to-day operational management and decision-making to the Executive team. The Chief Executive Officer had responsibility for oversight of Activ’s risk and compliance obligations, including in relation to Modern Slavery reporting.

For more information about our organisation for FY24, please refer to our 2023-2024 Annual Report via our website www.activ.asn.au.

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, all of which ultimately have an objective of ensuring that universally recognised human rights are safeguarded.

Activ has a Modern Slavery Policy and Supplier Code of Conduct in place to further support the recognition of human rights and safeguards.

Our Operations FY24

Activ works across Western Australia to enable people living with disability to pursue the life they choose. During FY24 Activ delivered services, and provided support, to people in the greater Perth Metropolitan area as well as in Albany, Geraldton and the South West region. Activ had no operations outside of Western Australia.

In FY24 Activ had approximately 1,234 Staff, 125 Supported Employees and supported around 780 individuals living with intellectual disability and their families.

The strategy for Activ during FY24 was to deliver proven pathways to independence for people living with disability. To achieve this, we supported people to live their own lives, set new goals and reach new milestones through services, including:

- Accommodation
- Community Support
- Employment
- Education and Training
- Allied Health

Activ also provided employment services to people living with disability through our commercial operations which included:

- Timber manufacturing
- Indoor Plant Rental
- Property care and horticulture
- Customer Service (including administration)
- Information and Technology Support
- Cleaning Services
- Painting Services

Our Suppliers / Supply Chains

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, including the use of 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.

Whilst Activ purchases from suppliers who are based in Australia and overseas, its suppliers are predominately located in Australia, are Australian owned and operated, and so are deemed generally less likely to engage in practices that would constitute Modern Slavery.

Assessing and Addressing Modern Slavery Risks FY24

Supply Chain Scoping

The Governance and Risk Team have assessed Activ's supply chain by identifying all suppliers, their location, and the value of spend activity during FY24. Activ applied a risk-based approach to assessing the identified group of suppliers and our top 61 suppliers (who represent 72% of our annual expenditure, a range from \$80K up to \$2.3m) were assessed for the FY24 period in relation to this Modern Slavery Statement.

A survey was requested to be completed by suppliers with a focus 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 including their reporting requirements.

Risk Assessment

A detailed review of the responses from our suppliers, or their publicly available statements was conducted. Most Australian suppliers used by Activ are specialised providers requiring highly skilled staff, who have therefore been assessed as likely to be well paid and have good working conditions. Activ has assessed these suppliers as having a lower risk of Modern Slavery practices. Of note from the review:

- 61 suppliers were selected for review (top 72% suppliers based on spend);
- Of this, 72% of the suppliers had modern slavery data available in various formats (suppliers).
- Of the 61 suppliers, 30 have a modern slavery statement available.
- 18 suppliers participated/completed Activ's Modern Slavery Survey (4 also had modern slavery statement available).
- 17 noted within the survey they did not need to undertake a Statement in line with the Act.
- 7 suppliers had international or website statements.
- Of those suppliers that have not responded to Activ's survey, or where a Modern Slavery Statement is also not available (17), Activ has endeavoured to obtain additional information on the suppliers for review. Of note majority of these suppliers are from professional services within Australia. The risk of modern slavery in these organisations is considered to be low.

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 from Activ.

Activ has taken several steps to manage its risk by:

- ongoing monitoring of Modern Slavery practices by the Governance and Risk and Contracts and Procurement Teams;
- requesting suppliers complete an annual 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
- requesting all suppliers complete Activ's Supplier Code of Conduct declaration which 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.

Note that Activ is committed to suspending any services from a particular supplier if we identify any risks of exposures to Modern Slavery practises.

Measuring Effectiveness

Activ remains committed to better embedding Modern Slavery Awareness within our supply chains and operations.

Activ is committed, 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 FY24 Activ increased the Modern Slavery review of its suppliers to 72% of overall expenditure (compared with 69% in FY23).

Awareness and Training

To ensure organisation-wide understanding of the Modern Slavery risks within our operations and supply chains, Activ undertakes the below:

- New Starters - Orientation materials 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 all new staff as part of the Activ Orientation Program;
- Activ All Staff – Annual communication to all staff (new/existing) of Modern Slavery and Activ's Policy for mitigation of Modern Slavery exposure and risk; and
- Key Purchasing, Supply Management and Accounts Staff – increased awareness on the importance of adherence to the Supplier Code of Conduct and Activ's legal responsibilities to identify and report potential risks; and mitigate exposure to Modern Slavery practices.

Our Commitment

We recognise that our review and assessment of our supply chains, to identify and address any modern slavery risks in our operations, will be an ongoing and an evolving process that we are committed to continue to build upon.

As at 1 July 2024, Activ Foundation Limited merged with Karingal St Laurence Limited (genU). During FY25, Activ will transfer alignment of processes and procedures to genU's framework of Modern Slavery controls in supply chains. Furthermore, future reports will be consolidated with the genU Group Modern Slavery Statement.

~ End of Statement ~