

MODERN SLAVERY STATEMENT

2023-2024

genü

CONTENTS

INTRODUCTION.....	3
WHO WE ARE.....	3
BUSINESS AND SUPPLY CHAIN	4
POLICIES.....	5
ASSURANCE VERIFICATION.....	5
RISK ASSESSMENT AND DUE DILIGENCE	5
STAFF TRAINING AND AWARENESS	5
ACTIONS TAKEN.....	6
FUTURE PLANS.....	6
CONCLUSION	6

OUR VALUES



WELCOMING



INNOVATIVE



SAFE



EMPOWERED



RESPECTFUL

In the spirit of reconciliation, genU acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea, and community.

We pay our respect to their Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander peoples.

We are proud to continue our reconciliation journey with the genU Innovate Reconciliation Action Plan, introduced in March 2023.

Artwork copyright Chris Delamont, Wirandjuri/Nari Nari, Riverina, Balnuruwanha 'Take Flight', 2022.



WHO WE ARE

For more than 70 years, genU has been an intrinsic part of our local communities.

genU helps people of all ages and abilities to find jobs, homes, training, support and assistance to lead a fulfilling life, based on their individual circumstances and needs.

Today, genU provides support and services to around 47,000 people a year through our core disability, ageing, training and employment services. We have more than 5,070 staff across Australia.

genU continues to seek opportunities to extend our reach and improve our services to enrich the lives of more Australians, and to grow our positive impact through everything we do.

As a profit-for-purpose organisation, we're committed to reinvesting our surpluses into services that build inclusive communities.

Karingal St Laurence Limited (ACN 614 366 031) is a public company limited by guarantee, is registered with the Australian Charities and Not for Profits Commission and conducts its business under various registered trademarks and business names, including genU and MatchWorks, throughout Australia.

The reporting entity's registered office is located at 21-29 Reynolds Road, Highton, Victoria 3216.

Karingal Aged Care Pty Ltd (ACN 111 398 148) and St Laurence Community Services Inc Reg Assoc A0033023X were not operational and did not procure goods and services during the Reporting Period.

IPA Personnel Services Pty Ltd (ACN 137 834 738) (IPA) provides recruitment and labour hire services nationally and was operational during the Reporting Period.

Together, the four entities make up the genU Group. The genU Group is governed and managed by the same Board, Chief Executive Officer and Executive Leadership Team and as a result, all entities owned or controlled by Karingal St Laurence are included in this Statement.

OUR VISION

Genuinely inclusive communities.

OUR PURPOSE

Enriching lives through connections, supports and opportunities

INTRODUCTION

Karingal St Laurence Limited (ACN 614 366 031) ("genU") has developed this Modern Slavery Statement ("The Statement") in line with the Modern Slavery Act (2018) requirements ("The Act").

genU does not tolerate modern slavery within our business or supply chains in any form. We are committed to implementing effective systems and controls to ensure that modern slavery and human trafficking do not occur in our own business or in those business' that supply genU.

This statement explains the actions we have taken to prevent, identify, and manage risks related to modern slavery across our business and throughout our supply chains during the reporting period 1 July 2023 to 30 June 2024.

It was approved by the Board of Directors, Karingal St Laurence Limited (genU) on 18 November 2024, and is signed by Clare Amies in her role as the CEO of Karingal St Laurence Limited (genU).



Clare Amies
Chief Executive Officer
Karingal St Laurence Limited (genU)

BUSINESS AND SUPPLY CHAIN

genU continues to invest in dedicated software (Informed 365) that assists us in identifying and mitigating the risks of modern slavery in our supply chains. This program automatically issues questionnaires to suppliers and profiles the risks of modern slavery based on three key metrics - country, industry and overall.

As part of our partnership with Informed 365, genU is one of the founding members of the For Purpose Consortium. This Consortium is a group of like-minded not-for-profit entities that have also partnered with Informed 365 to help profile supply chain risks of modern slavery.

genU defines a supplier for the reporting period as a commercial entity who provides genU with goods and services to the value of no less than \$150,000 in any given financial year, or to a value of no less than \$50,000 for at least three continuous years. We call this group 'Continuous Suppliers'. Suppliers are engaged and vetted by the Procurement Team based on the forementioned information and these suppliers are required to complete our Modern Slavery Questionnaire prior to entering into a contract or agreement with genU.

During the last reporting period, genU implemented the new SAP finance system that has enabled us to better identify suppliers that fit into either of the above categories. During the same reporting period, genU surveyed 192 suppliers in our supply chains that meet the above definition, representing a 60% increase from 120 suppliers identified in the previous reporting period.

Of the 192 suppliers surveyed, 110 have completed the Modern Slavery Questionnaire. A further 42 suppliers have started the questionnaire, showing genuine intent to comply. genU currently has a supplier response rate of 57%, which is a 3% increase from the previous reporting period.

Details of suppliers who have completed the questionnaire will be provided as this generates for genU a higher level of comfort around those suppliers' willingness to work with us to identify and eliminate serious human rights issues.

Based on the survey responses received to date, genU is exposed to:

- very low levels of risk of modern slavery based on the country our suppliers operate from
- medium level of risk based on their industry of operations
- low to medium risk based on their Informed 365 overall risk index.

This risk summary is in line with the outcomes from previous reporting periods.



POLICIES

genU has numerous policies, guidelines, procedures and working groups in place that outline and fulfil our enforcement of Human Rights, and advance and support a diverse and inclusive workforce. Key examples of these include:

- Procurement and Purchasing Policy
- Contract Review and Execution Checklist
- Risk, Compliance and Integrity Management Committee
- Risk Management Framework
- Supplier Code of Conduct and Declaration
- Slavery in the 21st Century – Training Module.

ASSURANCE VERIFICATION

All information collected relating to modern slavery is done through a dedicated platform (Informed 365) that helps us to profile the risks of modern slavery in our supply chain. Informed 365 ensures that all questionnaires are stored and filled out on one platform for ourselves and other members of the For Purpose Consortium.

RISK ASSESSMENT AND DUE DILIGENCE

genU engages large suppliers and providers through a competitive tender process to render any goods/services to our organisation. As part of this rigorous process, these suppliers are required to positively respond to several requirements including social responsibility, diversity and modern slavery, all of which are considered when selecting appropriate suppliers for the final contract. The successful applicant must then submit responses to the Modern Slavery Questionnaire prior to beginning any work with genU, which is driving an increase in the overall supplier completion rate across genU.

STAFF TRAINING AND AWARENESS

genU continues to incorporate information and resources to all team members when delivering procurement training. We also have an internal training module called “Modern Slavery – Slavery in the 21st Century”, which is required to be completed by the below team members within the organisation:

- All members of our Executive and Senior Leadership Team
- All managers
- All staff and their managers who either raise and approve Purchase Orders or perform a contract manager role.

genU also has modern slavery principles embedded into all procurement processes.

ACTIONS TAKEN

As part of the genU's commitment to managing modern slavery risks in our operations and supply chain, our Modern Slavery Plan has short, medium, and long-term actions to improve our management of potential modern slavery risks.

Actions progressed during this reporting period include but are not limited to:

- A risk assessment checklist to identify modern slavery risks within genU was incorporated into our contract review and execution checklist.
- Assessment undertaken of genU's suppliers to determine which suppliers should be engaged around modern slavery.
- Redevelopment of the Procurement and Purchasing Policy to determine the engagement required with suppliers based on the level of risk.
- Improved training of our staff to ensure awareness of modern slavery risks, specifically for those that are involved within the procurement processes, such as belonging to a tender panel or a contract manager.
- Digital investment, including implementation of a new finance and purchasing system, and imminent implementation of a new operating model to centralise all of procurement across the organisation which will allow for greater controls to be put in place for the management and onboarding of suppliers that provide goods and/or services to genU.
- Regular attendance and input to the Informed365 roundtable meetings to increase engagement.

FUTURE PLANS

We are working on broadening and enhancing our analysis and training of our supply chains against modern slavery values whilst looking at ways to strengthen our internal controls.

genU anticipates that in the next reporting period many initiatives will be implemented including:

1. Centralisation of our procurement and purchasing teams. This will ensure that team members dealing with suppliers on a regular basis are well versed in modern slavery principles and requirements and can pinpoint risks quickly and effectively.
2. Embedding the Modern Slavery Questionnaire into all supplier onboarding forms to increase the uptake in supplier completion.
3. Modern Slavery Plan to be enhanced to include medium and long-term actions to mitigate any modern slavery risks within the suppliers engaged by genU.
4. Modern Slavery Risk Register to be developed to track and manage all Modern Slavery risks identified within genU.
5. Broadening the current supplier base that are required to complete our Modern Slavery Questionnaire to become all suppliers engaged by genU that we pay over \$50,000 a year.

CONCLUSION

genU remains steadfast in our commitment to combat modern slavery and human trafficking.

This Modern Slavery Statement reflects our ongoing efforts and our dedication to transparency, ethics, and social responsibility. Through meticulous process review and reform, we will continue to work diligently and in collaboration with like-minded partners to ensure that our operations and supply chain are free from any form of modern slavery.

**THANK YOU FOR READING
GENU'S MODERN SLAVERY STATEMENT.**

If you have any questions about the information
contained in this statement, please contact:
companysecretary@genu.org.au

genU Karingal St Laurence

ABN 74 614 366 031 | ACN 614 366 031 | TOID 5553

