



Lifestyle Solutions

Modern Slavery Statement

Commitment

Lifestyle Solutions (Aust) Ltd (**LS**) is committed to preventing modern slavery and human trafficking occurring in any of its operations as well as seeking to ensure that our supply chain is also free from such practices.

LS has a zero-tolerance approach to modern slavery and human trafficking and are committed to acting ethically and with integrity in all activities and business relationships. We expect our supply chain, contractor, employee, and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent any detect modern slavery.

We understand that modern slavery is unlikely to prosper where other human rights are respected and that the Act draws on principles adopted in the 2011 United Nations Guiding Principles on Business and Human Rights (**UNGPs**) which set a global standard of expected conduct for all business enterprises.

LS undertakes to comply with the Act, the UNGPs and all other applicable modern slavery and human rights laws and frameworks. While this Statement is the third public disclosure specifically addressing modern slavery, LS has been committed to the improvement of the rights and wellbeing of people across our operations for many years.

Statement

LS will continue to review its supply chains and internal/external operations on an ongoing basis to check compliance.

The Directors and Senior Management Teams of LS have overall responsibility for ensuring LS complies with its legal and ethical obligations, and that all persons working for LS or on our behalf in any capacity comply with it.


The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is also the responsibility of all persons working for us or on our behalf in any capacity (including our employee, suppliers, workers, director, and any third-party business partners).

Reporting Entity

The reporting entity is Lifestyle Solutions (Aust) Ltd (ACN 097 999 347), with its Head Office located at 33 Fern Street Islington NSW 2296.

Our purpose is to enable the people we support and their communities to achieve what is important to them and our Strategic Plan sets out what we are doing to deliver on this purpose. We have a Strategic Ambition to grow social impact and will do this by supporting more people, in more places, with the best quality services.

LS's vision is to support more Australians to live as equal and empowered citizens, to enable our people to develop great careers, and to grow our social impact in the community. Underpinning our purpose and vision are our values that guide how we work.



LS is a national organisation with quality and safeguarding standards, policies, and protocols to the improvement of the rights and wellbeing of people across our operations, in the sector and in the community more broadly.

LS is a not-for-profit organisation and is a company limited by guarantee. We engage approximately 2,700 employees and we work to support around 2,700 people and their families in our communities. LS was not part of a larger corporate group of entities and does not own or control any other entities during the FY22. LS also traded under the brand names of Bindi Enterprises and Camp to Belong. LS operates entirely in Australia and spans across all States and Territories.

LS provides services for people living with disability in the areas of supported independent living, individual supports and community/social/recreation supports, clinical supports, support coordination, disability enterprise and transition to work supports. LS provides services for children and young people in Out of Home Care and foster care.

LS values drive day-to-day behaviour which are fundamental in protecting our staff and the people we support.

Our supply chains are multi-tiered, consisting of approximately 3,400 suppliers. Our suppliers are engaged to enable the support services we provide, and we understand that most of our suppliers operate in Australia.

Our primary operations consist of services delivered to vulnerable people in our community and as such the very core of our business involves a deep understanding of vulnerable people including the risks of exploitation when working with these individuals and groups. As such, we believe we have an entrenched culture of ensuring that vulnerable people are seen, heard, and treated with respect and dignity.

Further to that, due to the nature of the work we do, we are subject to rigorous laws and regulations requiring due supervision and a high duty of care to be taken in all our activities. LS has a zero-tolerance approach towards the exploitation of vulnerable people.

Modern Slavery Risks

LS operates in Australia only but has suppliers who operate overseas, and we have a complex multi-tiered supply chain as our procurement needs are diverse. We understand this increases the risk of our organisation being directly linked to modern slavery practices through the activities of another entity that we have a procurement relationship with.

Our journey to fully and accurately understanding where our risks lie is a continuing one. The purpose of identifying these risks above is so that LS can more accurately assess, address, and mitigate these risks.

Actions to address risks

LS has a Modern Slavery Policy which is displayed on company internet site.

LS has developed training on Modern Slavery as part of Induction for new staff.

LS undergoes a due-diligence process on our suppliers which will continue to be enhanced and we have engaged with Suppliers to ascertain an understanding and compliance with Modern Slavery requirements.

The risk for LS direct operations around Modern Slavery practices is low as LS employs staff in line with Human Right Guidelines and Principles.



LS has a Contractor Handbook explicitly references our Policy and Statement along with providing information to our suppliers. We have worked on improving our practices regarding contractual assurance and have developed provisions for our contracts under which services and procurement will be engaged. Among other things these contractual clause provisions will require suppliers to:

- warrant that modern slavery practices do not exist in their own businesses;
- warrant, to the best of their knowledge, that modern slavery practices do not exist in the businesses of their suppliers;
- warrant that they will notify us if they become aware that modern slavery is taking place in their operations or supply chains;
- warrant that they have put in place their own processes to ensure these warranties are valid.

The provisions also permit LS to terminate the supply contract if not complying with the above.

LS expects all its employees to comply with our human rights and modern slavery commitments. Our Whistleblowing Policy provides employees with established standards for appropriate workplace behaviours and conduct and provides the avenue for reporting incidents or improper conduct. The Whistleblower Policy was reviewed and endorsed by the governing body which enables all employees to report any concerns comfortably and confidentially, including those that they have relating to modern slavery in LS operations or within supply chains.

LS had a professional Board of Directors from across Australia that oversaw and worked collaboratively with our diverse and highly experienced management team.

We are committed to transparent and accountable governance that meets community expectations for an organisation delivering supports and services for some of the most vulnerable people in Australia.

Being a for-purpose organisation, ethics and good governance are crucial to what we do. We believe the following factors assist in our due diligence endeavours to identify, assess, and address risks of modern slavery in our operations and supply chains:

- Expertise applied in practice to our workforce in relation to workplace, industrial relations and workplace health and safety regulations;
- All employees, directors and volunteers of LS are required to provide 100 points of identification, police check undertaken and evidence of their right to work in Australia prior to commencement of employment;
- LS has robust governance and compliance mechanisms in place that mitigate the risk of human rights abuses occurring. The board and its sub committees have robust safeguarding oversight (Quality and Safeguarding Committee, Audit, Risk and Compliance Committee, Governance Nomination and Remuneration Committee).

Effectiveness

LS are implementing and enforcing several measures, policies, and controls both internally and externally to ensure compliance with the requirements of the Modern Slavery legislation including:

- Training on Modern Slavery and Human Traffic which forms part of the induction process for all individuals joining the business;
- Information and advising staff current staff, including avenues to report;
- Engaging with suppliers and contractors;
- Specific Modern Slavery clauses in contracts;
- Continue to improve on Risk Management and practices.



In line with accredited Management Systems, LS will continue to improve effectiveness through risk assessments and control measures along with introducing improved systemised approach to supplier and contractor engagement.

This statement was approved by the Directors of LS in their capacity as principal governing body of LS on 21 December 2022.

This statement is signed by Drew Beswick in his role as Chief Executive Officer of LS on 21 December 2022

Drew Beswick
Chief Executive Officer of LS
21 December 2022