



# Policy Statement

## Modern Slavery

### 1. Introduction

Helping Hand Incorporated (ABN 19 636 743 675) (“**Helping Hand**”, “**we**”, “**our**” or “**us**”) values independence, choice, freedom and quality of care. We enable our consumers, carers and their families to live their lives to the full. We make people feel at home in our residential homes, in their own home and in their workplace.

Additionally, Helping Hand is committed to upholding high ethical standards within its own operations and within the operations of those it does business with. Helping Hand’s core values of compassion, respect, excellence and community underpin everything that we do in our work, interactions, decisions and strategies. Accordingly, Helping Hand has a zero-tolerance approach to any instances of modern slavery occurring in our operations or supply chains.

### 2. Intent

Helping Hand is committed to respecting human rights and addressing risks of modern slavery in its organisation and supply chains. This Policy is intended to complement the initiatives Helping Hand is undertaking to address, monitor and reduce the risks of modern slavery in its organisation and supply chains.

Helping Hand is a reporting entity under the *Modern Slavery Act 2018* (Cth) (“**Act**”). The Act requires Helping Hand to make annual public reports known as “modern slavery statements” on the actions it has taken to address the modern slavery risks in its operations and supply chains (“**MS Statements**”).

The purpose of this Modern Slavery Policy (“**Policy**”) is to set out procedures to:

- 2.1 prevent, mitigate, and where appropriate, remedy modern slavery in our operations and supply chains;
- 2.2 encourage employees to raise any concerns and report instances of modern slavery or suspected modern slavery;
- 2.3 source products and services in accordance with legal obligations and community expectations while working with suppliers; and
- 2.4 help to ensure that Helping Hand maintains high standards of ethical behaviour and integrity.

### 3. Scope

This Policy is applicable to all employees, directors, officers, agency workers, contractors, consultants, volunteers, or any other third-party representative of Helping Hand or any related body corporates within the meaning of the *Corporations Act 2001* (Cth).

This Policy must be read in conjunction with the Helping Hand Whistle-blower Procedure (HRD104P).



## 4. What is modern slavery?

Modern slavery is defined as the severe exploitation of other people for personal or commercial gain. Modern slavery describes situations of coercion, threats, or deception which are used to exploit victims and undermine their freedom. Practices that constitute modern slavery include:

- slavery;
- slave trading;
- sexual servitude;
- forced labour;
- forced marriage;
- debt bondage;
- human trafficking; and
- child labour.

Modern slavery does not include practices like substandard working conditions or underpayment of workers. However, these practices are harmful and may present within some situations of modern slavery listed above. Nonetheless, Helping Hand takes these substandard working conditions very seriously and will continue to work to remediate any substandard working conditions prevalent within its supply chains.

## 5. Helping Hand's Framework for Compliance

The following sets out Helping Hand's framework and process to identify risks of modern slavery.

### 5.1 Modern Slavery Contract Clause

All Helping Hand supplier contracts should include a clause requiring suppliers to ensure that it and its subcontractors will comply with the Act and all of Helping Hand's relevant policies and procedures.

### 5.2 Supplier Due Diligence

Personnel who are authorised to engage suppliers must undertake due diligence on suppliers in accordance with this Policy.

Due diligence procedures are undertaken on suppliers as follows:

- 5.2.1 All new suppliers with a spend of more than \$2,000 per annum undergo a due diligence screening.
- 5.2.2 If the spend on the new supplier is more than \$10,000 per annum or the supplier is considered to be low risk under the due diligence screening in paragraph 5.2.1, the new supplier is approved as a supplier.
- 5.2.3 If the spend on the new supplier is more than \$10,000 per annum or is deemed to be moderate or high risk under the due diligence screening in paragraph 5.2.1, the new supplier must complete a questionnaire.



- 5.2.4 All suppliers are subject to annual refreshment of due diligence.
- 5.2.5 Suppliers who are renewing or extending their contracts will have their due diligence refreshed.

### 5.3 Moderate to High-Risk Suppliers

- 5.3.1 Following completion of the questionnaire in accordance with paragraph 5.2.3, if a supplier is identified as moderate or high risk, Helping Hand will conduct further due diligence on the supplier. This includes, but is not limited to:
  - 5.3.1.1 requesting the supplier to complete Helping Hand's modern slavery training;
  - 5.3.1.2 performing a site audit of the suppliers premises;
  - 5.3.1.3 requesting any policies or documents of the supplier relating to modern slavery or human rights for review (i.e. modern slavery statement or human rights policy); or
  - 5.3.1.4 requesting any other relevant information from the supplier related to their operations and supply chains.

### 5.4 Employee Training

- 5.4.1 To ensure all employees are able to identify and report modern slavery or suspected modern slavery, Helping Hand has established an employee training program. The training includes the following:
  - 5.4.1.1 how to identify modern slavery; and
  - 5.4.1.2 how to report modern slavery or suspected modern slavery.
- 5.4.2 Employees that are involved in accounts, management or procurement divisions at Helping Hand may receive further training on their obligations regarding due diligence on suppliers, including why and how it is conducted as and when appropriate.
- 5.4.3 Employee training is delivered in a method at the discretion of Helping Hand. This may include face to face training, online training modules or a handout form.
- 5.4.4 Employee training will be conducted on induction and refreshed when required thereafter.

### 5.5 Remediation

If Helping Hand identifies modern slavery in its supply chain, it may;

- 5.5.1 undertake further due diligence to assess the conduct;
- 5.5.2 provide notice of the conduct to the supplier as well as a specific duration for the supplier to remedy the conduct; and/or



5.5.3 give notice to the supplier of the contract's termination.

## 5.6 Tracking effectiveness and auditing

Helping Hand will conduct an annual audit of the processes it has in place to address and mitigate modern slavery and assess their effectiveness. The audit will review the number of:

- 5.6.1 new and existing suppliers;
- 5.6.2 screenings issued and completed;
- 5.6.3 questionnaires issued and completed;
- 5.6.4 suppliers tracked for remediation (training, further questions and review of their modern slavery statement);
- 5.6.5 employees who received modern slavery training; and
- 5.6.6 contracts with modern slavery contract clauses.

## 6. Reporting modern slavery

- 6.1 Helping Hand have reporting avenues available to employees to report any genuine concerns about modern slavery relating to Helping Hand's people, business, suppliers or supply chain.
- 6.2 Helping Hand supports workers to raise concerns or issues without fear of disciplinary action, dismissal or discrimination. Any report of modern slavery or suspected modern slavery will be investigated. Helping Hand may consult with or engage a third party to assist with such investigation, if thought necessary or desirable.
- 6.3 Any reports, notifications, questions or concerns in relation to modern slavery by employees or suppliers should be made:
  - 6.3.1 to Procurement department or Procurement Manager of Helping Hand at [contracts@helpinghand.org.au](mailto:contracts@helpinghand.org.au); or
  - 6.3.2 in accordance with Helping Hand's Whistle-blower Procedure (HRD104P).

Any matter raised with the above persons are confidential and you may make an anonymous report.

## 7. Supplier Code of Conduct

Helping Hand requires that suppliers operate in accordance with the Helping Hand Supplier Code of Conduct ("**Supplier Code of Conduct**").

The Supplier Code of Conduct sets out the standards of behaviour that is expected of business partners, stakeholders and people. The Supplier Code of Conduct expressly states Helping Hand's commitment to human rights and our rejection of any form of modern slavery.

### 7.1 Minimum standards for suppliers



In accordance with the Supplier Code of Conduct, all suppliers and third parties (“**suppliers**”) engaged by Helping Hand are expected to meet the following minimum standards:

#### 7.1.1 **Working conditions**

Suppliers must provide a safe and hygienic working environment for their workers that is without risk to their health or safety. A safe working environment includes:

- no discrimination based on personal characteristics, such as gender, ethnicity, religion, age, disability, marital status, sexual orientation, or union membership;
- no harassment or abuse, including physical, sexual, verbal or visual behaviour that is offensive, hostile or intimidating; and
- access to grievance mechanisms and recourse to prevent discrimination against workers for reporting any legitimate concerns.

#### 7.1.2 **Modern slavery practices**

Suppliers must not use any form of modern slavery in its operations, including forced labour, debt bondage, child labour, or indentured labour.

#### 7.1.3 **Wages**

Suppliers must comply with all laws regulating local wages, including overtime compensation and legally mandated benefits.

#### 7.1.4 **Working hours**

Working hours should not exceed the maximum hours stated by local laws. If overtime work is agreed between the supplier and the worker, the hours should not be excessive or a regular occurrence.

#### 7.1.5 **Bribery and corruption**

Suppliers must not offer, pay or accept any bribes, favours, benefits or other unlawful or improper payments of any kind, regardless of whether this is connected with gaining business.

#### 7.1.6 **Sub-contractors**

Where a supplier is permitted to sub-contract to a third party, the supplier must appropriately manage the sub-contracting party to ensure they are acting in accordance with this and any other relevant policy.



## 8. Modern Slavery Statement

Helping Hand will publish an annual MS Statement pursuant to the requirements of the Act.

The MS Statement, amongst other things, will address the criteria set out in the Act and identify the actions taken by Helping Hand to identify, assess and mitigate modern slavery risks within Helping Hand's operations and supply chains. The modern slavery statement will also set out plans for future improvements to the current modern slavery actions in place.

## 9. Policy availability, review and amendments

### 9.1 Availability of this Policy

A copy of this Policy will be available to employees via Helping Hand's website on the internet and will be made available to our people and suppliers.

### 9.2 Policy review

The Board will review this Policy every three (3) years.

### 9.3 Amendment of policy

9.3.1 This Policy can only be amended with the approval of the Board.

9.3.2 Helping Hand will communicate any Policy amendments to any relevant individuals captured within the scope of this Policy.

## Links to Standards

### **ACSQC Standards**

Standard 7: Human resources

Standard 8: Organisational governance

### **NDIS Practice Standards**

Standard 2: Provider Governance and Operational Management