

Modern Slavery Policy

1. Purpose

The purpose of this Policy (the Policy) is to outline Lifestyle Solutions' commitment to prevent, detect and report the risk of slavery or human trafficking within Lifestyle Solutions' operations and supply chains.

The Policy articulates the fundamental elements of Lifestyle Solutions' approach to human rights and how Lifestyle Solutions demonstrates its commitment to respect human rights in line with international frameworks.

This policy is underpinned by, and to be read in conjunction with, the Code of Ethics and Conduct. This policy applies to all team members, Directors and affiliates of the organisation.

2. Policy Statement

Lifestyle Solutions acknowledges that it has obligations to protect human rights, starting from the way it conducts its business now and into the future. Lifestyle Solutions is committed to ensuring there is transparency in its operations and approach to tackling modern slavery. Lifestyle Solutions is committed to ensuring that modern slavery is not taking place in its operations and supply chain.

3. Related Documents

Document Name
Code of Ethics and Conduct
Whistleblower Policy
Work Health and Safety Policy
Anti-Discrimination Policy
Respect Policy
Aboriginal and Torres Strait Islander Cultural Protocols
Customer Charter of Rights
Privacy, Dignity and Confidentiality

4. Related Legislation

Laws and Standards	Link
Modern Slavery Act 2018 (Cth)	https://www.legislation.gov.au/Details/C2018A00153
Fair Work Act 2018 (Cth)	https://www.legislation.gov.au/Details/C2018C00512
Australian Criminal Code Act 1995 (Cth), specifically, Division 270 or 271 of the Criminal Code, extending to conduct in and outside of Australia	https://www.legislation.gov.au/Details/C2019C00043
Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework	https://www.ohchr.org/documents/publications/guiding_principlesbusinesshr_en.pdf

Laws and Standards	Link
Protocol to Prevent, Suppress and Punish	https://www.ohchr.org/en/professionalinterest/pages/pr
Trafficking in Persons, Especially Women and Children	otocoltraffickinginpersons.aspx
ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour	https://www.ilo.org/dyn/normlex/en/f?p=NO:RMLEXPUB:1_2100:0::NO::P12100_ILO_CODE:C182

5. Modern Slavery and Human Rights

Modern slavery has a broad scope and includes practices involving slavery or slavery like offences, forced labour, deceptive recruiting for labour or services, forced marriage offences, debt bondage, threats of coercion, trafficking in persons and/or children, organ trafficking, and harbouring a victim.

Lifestyle Solutions understands that modern slavery is unlikely to prosper where other human rights are respected. The *Modern Slavery Act 2018 (Cth) (MSA)* draws on principles adopted in the 2011 United Nations Guiding Principles on Business and Human Rights (**UNGPs**). The UNGPs set a global standard of expected conduct for all business enterprises.

Lifestyle Solutions undertakes to comply with the MSA, the UNGPs and all other applicable modern slavery and human rights laws and frameworks. Lifestyle Solutions expects all team members and suppliers to comply with our human rights and modern slavery commitments.

Lifestyle Solutions has a zero-tolerance approach to modern slavery within Lifestyle Solutions' operations and its supply chain.

6. Risk Assessment and Due Diligence processes

Lifestyle Solutions considers the risk of modern slavery within its direct internal operations to be low. Lifestyle Solutions also recognises that it has a complex multi-tiered supply chain, which may mean it can be directly or indirectly exposed to risks of modern slavery.

Lifestyle Solutions has risk management processes to assist in identifying areas of concern so that mitigating action can be taken to lessen those risks. These include:

- (a) Inclusion of mandatory modern slavery clauses in labour hire contracts;
- (b) Supply chain mapped for modern slavery risk potential;
- (c) Due diligence processes when taking on new suppliers;
- (d) Supplier engagement to outline our expectations on all suppliers in relation to Lifestyles zero tolerance approach to modern slavery;
- (e) Stand alone Modern Slavery Policy (pending board endorsement);
- (f) Whistleblowing Policy, which enables team members to comfortably and confidentially report any concerns including those that they have relating to modern slavery in Lifestyle Solutions' operations or within supply chains;
- (g) Rigorous safeguarding policies and procedures are already in place to ensure we keep the people we support safe;



- (h) Tailored modern slavery awareness training for all team members regarding the risks Lifestyle Solutions faces in relation to modern slavery in its supply chains;

Annual review of due diligence processes will be conducted in line with the preparation of Lifestyles Annual Modern Slavery Statement in accordance with the legislation and best practice.

7. Suppliers

Lifestyle Solutions seeks to do business with suppliers that have similar values, ethics and sustainable business practises including in relation to human rights. Lifestyle Solutions understands that the risks relating to suppliers will vary depending on their industry, geographic location and company size.

Lifestyle Solutions' zero tolerance approach to modern slavery will be effectively and meaningfully

communicated to all suppliers and reinforced as appropriate thereafter.

Lifestyle Solutions will ensure that its suppliers adhere to the standards expected by Lifestyle Solutions, in accordance with our Supplier Code of Conduct.

Lifestyle Solutions is committed to auditing its suppliers and in monitoring their internal approach to risk management around modern slavery and human trafficking within their operations and supply chains.

8. Communication and Awareness of this Policy

8.1 Understanding of this Policy To ensure that our people know about this procedure and the Modern Slavery Policy, Lifestyle Solutions will ensure that regular communication and education are provided to its people on the contents of these documents. Lifestyle Solutions may from time to time provide training to its team members, especially those in positions where they are directly involved with procurement processes and manage relationships with suppliers.

8.2 Breach of this Policy Any team member who breaches this Policy by engaging in or conspiring to engage in any modern slavery conduct may face disciplinary action. Lifestyle Solutions may terminate relationships with individuals or organisations working on our behalf if they breach this Policy. Referral action to proper authorities will be taken in cases involving breaches of the criminal law.

9. Responsibilities

All team members have a responsibility to prevent, identify and report any concerns they may have in relation to modern slavery within Lifestyle Solutions' operations and supply chains. Team members are Lifestyle Solutions' first line of defence.

Lifestyle Solutions has a Whistleblowing Policy which provides protections for any team member who, in good faith, report any modern slavery-related wrongdoing within Lifestyle Solutions' operations and supply chains.

All reports of concerns relating to modern slavery will be treated with sensitivity, confidentiality and will be taken very seriously. Such concerns are to be reported in accordance with the Whistleblower policy.

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