

APNAGOV014
MODERN SLAVERY POLICY



VERSION	APPROVED BY	APPROVAL DATE	REVIEW DATE
01.00	APNA Board	25 July 2024	July 2025

1. Values Statement

- 1.1 The Australian Primary Health Care Nurses Association Ltd (APNA) values that inform this Policy are:
- *Better Together* which focuses on our team being passionate and collaborative and fostering an environment where diversity is valued, and all voices are heard.
 - *Pursue Excellence* which focuses on holding each other accountable as we strive for the highest standards.
 - *Positive Disruptor* which focuses on our team being community minded champions of change, innately curious and always open to innovation and ideas of the future.
- 1.2 These values support behaviours including, leading by example, respect and kindness in every action, championing positive leadership and having an inquisitive mind. The behaviours we do not tolerate are bullying, disrespect, dishonesty, arrogance dishonesty, being inflexible or unprofessional.

2. Policy Objective

- 2.1 Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 2.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all our contractors, suppliers, and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude, or debt bondage, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

3. Managing Risks

- 3.1 Effectively managing the risks of modern slavery within APNA relies on several key factors, including but not limited to:
- fostering a culture that emphasises integrity and strict adherence to our Code of Conduct, ensuring our team understand and commit to these values;
 - implementing comprehensive processes and procedures to assess, monitor, and address potential instances of modern slavery within our operations and supply chains;
 - regular training of our team on the importance of this Policy, including how to identify modern slavery risks within our business and supply chains;
 - communicating our commitment to combating modern slavery to all suppliers, contractors, and business partners at the start of our relationship and reinforce it as needed; and
 - encouraging openness and supporting anyone who raises genuine concerns in good faith, even if mistaken. We are committed to ensuring that no one faces adverse treatment for reporting suspicions of modern slavery within our business or supply chains.

4. Reporting

- 4.1 Everyone in our team is responsible for preventing, detecting, and reporting modern slavery in any part of our business or supply chains and must avoid any actions that could lead to or suggest a breach of this Policy.
- 4.2 If you believe or suspect that a conflict with this Policy has occurred or may occur, notify the Chief Executive Officer (CEO) as soon as possible.
- 4.3 We encourage you to raise concerns about any issue or suspicion of modern slavery at any stage and in any part of our business or supply chains.
- 4.4 If you are uncertain whether a specific act, the general treatment of workers, or their working conditions within any tier of our supply chains constitutes modern slavery, consult with the CEO.

5. Other Policies and Procedures

- 5.1 We have established formal policies designed to promote ethical and legally compliant business practices. Our commitment to preventing human rights violations is supported by the following policies:
 - Code of Conduct: We uphold fundamental human rights and adhere to the principles outlined in legal regulations.
 - Whistleblower Policy: We encourage openness and provide support to individuals who raise genuine concerns in good faith. We are committed to ensuring that no one experiences adverse treatment because of reporting suspicions related to modern slavery.
- 5.2 This Policy is reviewed annually to ensure robust processes are in place to minimise the risk of modern slavery within our business and supply chain. Additionally, APNA maintains policies that support awareness of acceptable conduct and provide mechanisms for reporting concerns about inappropriate behaviour.

6. Training and Awareness

- 6.1 We are committed to providing comprehensive and regular training to our team on this Policy. This training will include detailed information on how to identify various forms of modern slavery practices, such as forced labour, human trafficking, and exploitation. It will also highlight specific areas of our business and supply chains that are at higher risk for these practices. Furthermore, this training will be an integral part of the induction process for all new team members to ensure they are fully aware of our policies and expectations from the outset.
- 6.2 Our commitment to addressing modern slavery extends to all our business relationships. We will clearly communicate our stance against modern slavery to all suppliers, contractors, and business partners at the beginning of our engagement with them. This communication will include our expectations and the importance of adhering to this Policy. We will reinforce this commitment through ongoing dialogue and regular reviews to ensure continuous compliance and awareness.

7. Roles and Responsibilities

7.1 Board

- 7.1.1 Ownership of this Policy is vested in the Board. The Board has oversight accountability for approving policies and procedures, ensuring it is in line with APNA's legal and ethical standards and for monitoring the effectiveness of this Policy.
- 7.1.2 The Board must ensure compliance by APNA, our team, contractors, suppliers, distributors, and other business partners with this Policy and align its governance and oversight practices with the required regulations and any other legislation applicable to APNA's business.

7.2 Management

- 7.2.1 Management at all levels is responsible for ensuring that their direct reports understand and comply with this Policy. Managers must provide sufficient and regular training on this Policy and the issue of modern slavery, particularly in high-risk areas of our business and supply chains.
- 7.2.2 Additionally, management is accountable for overseeing this Policy's implementation to ensure it effectively mitigates risks, breaches, and non-compliance.

7.3 Chief Executive Officer

- 7.3.1 The CEO holds primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, and addressing any related queries. The CEO's responsibilities include:
- monitoring, consulting, and auditing internal controls and procedures to identify risks of modern slavery practices within our operations;
 - engaging with our suppliers, contractors, and business partners to identify risks of modern slavery practices within our supply chains;
 - developing and implementing measures to assess and address any identified risks of modern slavery practices, including conducting due diligence in our contractual relationships;
 - monitoring the effectiveness of these measures; and
 - creating and delivering appropriate training materials and programs to ensure team member compliance with this Policy.

8. Breach of Policy

- 8.1 Any team member found to be in breach of this Policy will face disciplinary action, which may include termination of employment for misconduct or gross misconduct. Similarly, if any supplier, contractor, or other individual or organisation working on our behalf breaches this Policy, we reserve the right to terminate the business relationship immediately and without notice.
- 8.2 In the case of suppliers or contractors, if modern slavery is substantiated, we will evaluate the appropriateness of continuing the business relationship and may terminate any agreement if deemed necessary.
- 8.3 Violations of this Policy are taken seriously and can result in severe consequences, including personal liability if the law is not complied with.

9. Policy Review

- 9.1 This Policy, as approved by the Board, shall be subject to an annual review. Furthermore, this Policy may be reviewed and amended more frequently as circumstances dictate. Any proposed revisions to this Policy must receive formal approval from the Board.