

# Human Rights and Modern Slavery Policy

24 February 2025

## Purpose

The purpose of this policy is to outline our organisational commitment to respecting, protecting and promoting human rights and combatting modern slavery.

## Scope

This policy applies to all Directors, Committee members, staff, contractors/suppliers, and volunteers of The Benevolent Society and any entity that is controlled by The Benevolent Society (**we, us, our**).

## Policy Statements

1. We are committed to respecting, protecting and promoting human rights. As a charity and human service provider, we acknowledge our role and responsibility in safeguarding human rights.
2. We comply with:
  - a. Fair Work Act 2009 (Cth)
  - b. Modern Slavery Act 2018 (Cth)
  - c. Australian Criminal Code Act 1995 (Cth), specifically, Division 270 or 271 of the Criminal Code, extending to conduct in and outside of Australia
  - d. Human Rights Act 2019 (QLD)
  - e. Charter of Human Rights and Responsibilities Act 2006 (VIC)
  - f. Human Rights Act 2004 (ACT)as they relate to and are relevant to us (**Human Rights Laws**).

Our work is also guided by relevant international human rights guiding principles, protocols and conventions including, but not limited to, the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; the International Convention on the Rights of Persons with Disabilities; the International Convention on the Rights of Indigenous Peoples' and the Convention of the Rights of the Child.

3. We take all reasonable steps to implement practices, procedures and systems to support us to:
  - a. ensure we comply with Human Rights Laws
  - b. deal with related enquiries and complaints, including any allegations or violations of human rights breaches, and
  - c. onboard, train and raise human rights awareness strategies for all our staff.
4. We recognise the importance of responding to any human rights concerns and having in place appropriate communication channels and grievance mechanisms to identify and address these concerns. We invite anyone who interacts with us to share with us any feedback they have if we have caused or contributed (directly or indirectly) any negative impact on their human rights. Individuals can let us know via our [Feedback and Complaints](#) system or where appropriate, reporting your concern under our [Whistleblower Protection](#) policy.
5. We are committed to assessing human rights compatibility with actions and decisions in accordance with Human Rights Laws, as relevant. All new and revised organisational policies are assessed for human rights compatibility.
6. We are committed to detecting, assessing, addressing, evaluating and reporting on modern slavery risks within our operations and supply chains. We report on these risks, and what we are doing to address them, to our internal and external stakeholders, including to the Commonwealth Government through annual Modern Slavery Statements.
7. We embrace and are embedding a human rights culture across the organisation including in the way we make decisions, develop policy and support our clients and the Australian community more broadly.
8. We are transparent about our organisational developments in human rights and modern slavery. This information is shared via our human rights and modern slavery page on our website.
9. We are a learning organisation and apply a continuous learning and improvement lens to our work and understanding of human rights and modern slavery. We value meaningful participation and seek feedback and consultation on our work as appropriate. We will set and review metrics to measure the effectiveness of our commitment to human rights and modern slavery. We will measure effectiveness yearly.
10. We take our role in respecting, promoting and protecting human rights and reducing modern slavery seriously. The Board, as the senior governing body of The Benevolent Society, approves this policy. The overall governing framework for

managing human rights and modern slavery is set out in our most recent Modern Slavery Statement.

11. This policy will be made available via the Benevolent intranet policy page and on the Benevolent website. Internal directions, instructions and educational guides are available on the [Legal and Corporate Governance Hub](#).
12. We will continually monitor, review and improve this policy. We adopt a continuous learning and improvement approach to this policy.

## Responsibilities and policy owner

- The policy owner is the Board.
- The policy is maintained by the Group General Counsel on behalf of the Board.
- The Board Chair has overall responsibility for the compliance of this policy at a Board level. The CEO has overall responsibility for the compliance of this policy at an organisational level.

## Consultation and approval

The following were consulted in the development of this policy:

- the CEO
- Executive Directors
- Human Rights and Modern Slavery Committee
- Risk, Quality and Safeguarding Committee

This policy has been approved by:

**The Board of The Benevolent Society**