Modern Slavery Policy

Organisation Description

Hands-On Infection Control Pty Ltd is a Western Australian-based consultancy that provides infection prevention, education and immunisation services across the healthcare and related service settings. As a boutique, local operated business with a limited supply chain and a workforce of fewer than five employees, we recognise our responsibility to identify and mitigate any potential risks of modern slavery in our operations and procurement activities.

Structure, Operations and Supply Chains

Our core services include:

- Infection prevention and control consultancy
- Pre-employment health screening
- Immunisation program delivery
- Education, training and competency assessment

Where able, we procure most of our goods and services from Australian-based suppliers, including:

- Vaccines (via authorised distributors)
- Healthcare consumables
- Office supplies and printed materials
- Waste management.

While our direct supply chain is limited and domestic, we acknowledge that some items such as healthcare products or digital tools may originate from international sources with heightened modern slavery risks.

Modern Slavery Risk

Given our size and largely local operations, the overall risk of modern slavery within our business is assessed as low. However, we recognise that indirect risks may be present in:

- Vaccine and medical supply manufacturing chains (especially where materials are sourced overseas)
- Imported PPE and packaging products
- Logistics services used for product delivery.

We remain alert to these potential risks, particularly during high-demand procurement periods such as influenza vaccine season and other events like global pandemics, natural disasters, significant weather events, political conflicts, economic shifts and trade disputes.

Actions Undertaken to Assess and Address Risks

While we do not meet the annual consolidated revenue threshold that triggers the disclosure obligations under the Modern Slavery Act 2018 (Cth), we have voluntarily implemented a modern slavery policy as a matter of integrity and business ethics:

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- We engage only with reputable, authorised suppliers who are licensed under Australian health regulations;
- We seek assurance from vaccine and healthcare consumables distributors and suppliers about ethical sourcing practices;
- We review supplier conduct where available, especially during new engagements; and
- Our team has been made aware of modern slavery risks in procurement through internal briefing and education.

Effectiveness Measures

As a small business, our assessments are informal but ongoing. We evaluate supplier practices during procurement reviews and remain open to improving our oversight as our operations evolve. To date, we have identified no indicators of modern slavery or unethical labour practices in our engagements.

Future Commitments

To uphold ethical standards, we commit to the following:

- Continue sourcing from suppliers who demonstrate compliance with Australian law and ethical sourcing practices;
- Maintain awareness among staff regarding modern slavery indicators;
- Integrate basic due diligence checks into procurement workflows; and
- Update this statement annually to reflect improvements and supply chain changes.

Variations

M Reilly Pty Ltd t/a Hands-On Infection Control reserves the right to vary this policy from time to time.

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