

Modern Slavery Statement

For Reporting Period ending 31 December 2023



Achieve Australia

Our Passion, Purpose and Principles

Achieve Australia has been providing services to support people with disability since 1952. Achieve Australia delivers a range of disability services in Greater Sydney and the Northern Rivers region of New South Wales.

Our Passion is social inclusion for people with disability.

Our Purpose is to build extraordinary lives, supporting people with disability to be well, have a home, choose a career, learn new skills, participate in their community and enjoy a full life.

The Principles of Achieve Australia are:



Living inclusion: Cultivate a sense of belonging in our organisation and community.



Elevating voices: Listen and activate the voices of people with a disability.



Engaging practice: Align our work to each person's ambition for a good life.



Growing capacity: Develop by collaborating, listening, learning and co-design.



Valuing resources: Foster cooperation, efficiency, and accountability for outcomes

A message

from Kerry Stubbs, Achieve Australia Board Chair
and Jo-Anne Hewitt, Achieve Australia CEO



Jo-Anne (left), Kerry (right)

Achieve Australia recognises and acknowledges the right of every individual to live a safe and fulfilling life, free from harm and discrimination. Freedom from slavery is a basic human right.

We recognise the importance of upholding ethical standards and protecting the rights and dignity of vulnerable individuals with disabilities. This Modern Slavery Statement outlines our commitment, policies, due diligence, and actions taken to combat these issues within our operations and supply chains.

Achieve is guided by the United Nations Guiding Principles on Business and Human Rights to prevent, address and remedy any human rights abuses committed in our business operations and supply chain. This is at the core of the purpose and passion of our organisation.

Achieve Australia is committed to ensuring that our organisation does not contribute to any modern slavery and human trafficking practices and is working to strengthen our organisational approach to these matters as an ongoing priority.

Achieve Australia has launched its Modern Slavery working group, that forms part of the broader Environmental, Social and Governance activities that Achieve has, and will continue to focus on and strengthen in the coming years.

We recognise that the prevention of modern slavery practices within our supply chain is a significant ESG goal to Achieve and will continue to prioritise this as part of our Operations, Procurement, Risk, Quality and Legal functions.

Modern Slavery

Achieve Australia recognises that modern slavery distorts global economies, affects corporate social responsibility and has devastating social impacts on the community.

This Statement outlines the activities Achieve Australia and its wholly owned subsidiaries take to prevent engaging in modern slavery and which are informed by the Modern Slavery Act 2018 (Cth).

Achieve Australia is committed to supporting the eradication Modern Slavery by implementing our policies on Human Rights and Modern Slavery.

Modern Slavery is defined in the Modern Slavery Act (Cth) 2018 as conduct which would constitute:

- a) an offence under Division 270 or 271 of the Criminal Code; or
- b) an offence under either of those Divisions if the conduct took place in Australia; or
- c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Examples of what constitutes Modern Slavery is forms of slavery such as servitude, trafficking in persons, forced labour, debt bondage, forced marriages, sale of and/or sexual exploitation of children or sale of children for forced labour exploitation, where victims are forced to work out of fear of violence and/or intimidation.

About Achieve

Governance, Structure and Operations

Achieve Australia (ABN: 49 133 306 902) is a not-for-profit organisation, limited by guarantee, and registered with the ACNC, employing over 1,200 employees. It is part of a wider Group, whereby Achieve Australia is the parent company, with several controlled subsidiaries.

The controlled entities are:

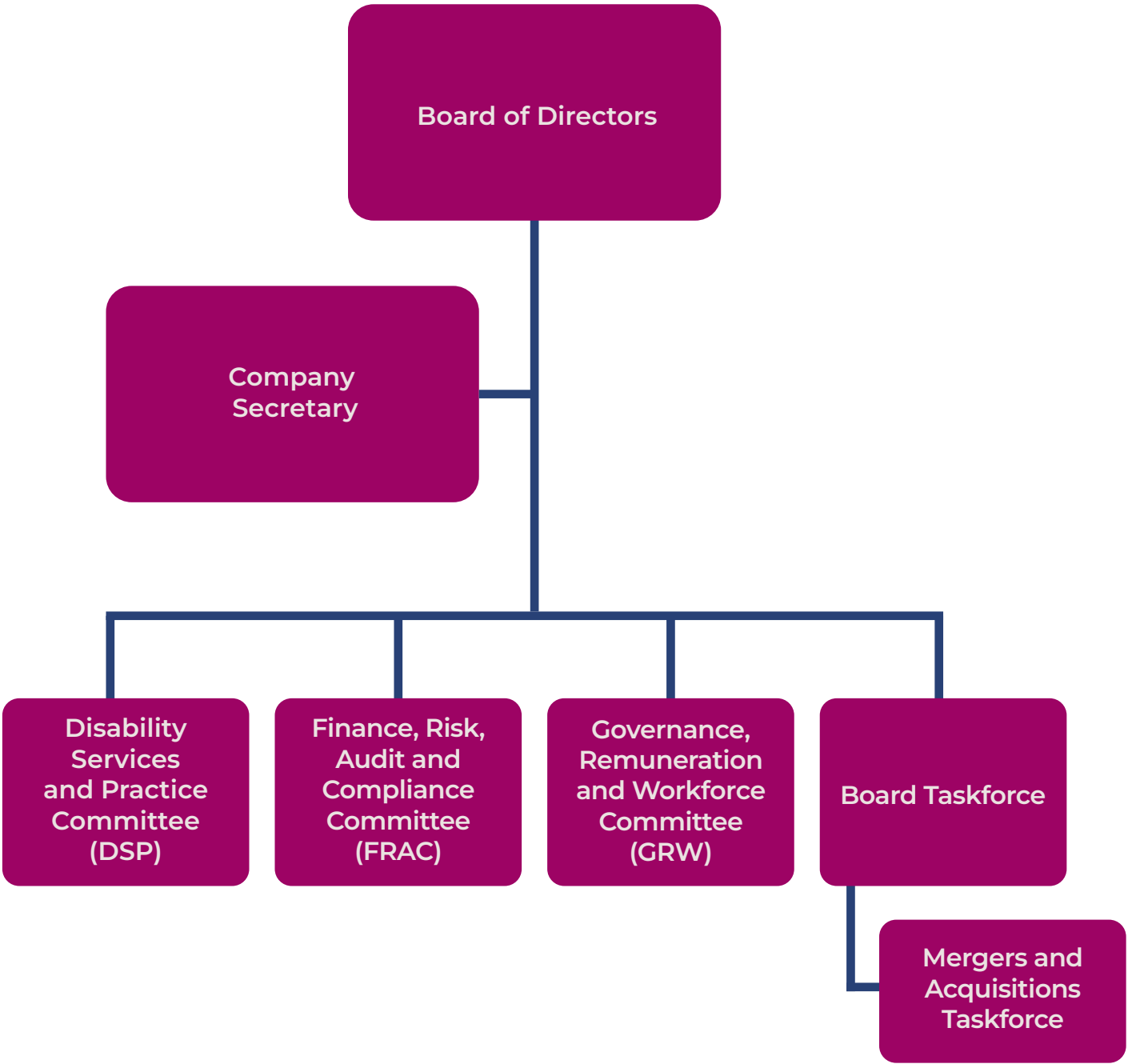
- Achieve Commercial Limited (ABN 63 144 947 124)
- Achieve In A Day Limited (ABN 63 144 947 188)
- Achieve In Ryde Limited (ABN 94 144 947 759)
- Achieve In Hornsby Limited (ABN 82 144 947 268)
- Achieve In Parramatta Limited (ABN 88 144 947 231)
- Achieve In Sydney Limited (ABN 84 623 564 063)
- Achieve in Inner West Limited (ABN 73 629 116 196)
- The Crowle Foundation Limited (ABN 48 059 150 604)
- On-Focus Australia Limited (ABN 87 898 155 038)

The Achieve Foundation Limited (ABN 76 059 432 610) is a wholly owned subsidiary of Achieve Australia. The purpose of the Foundation is to increase investment in disability and inclusion and build solutions at scale in disability housing and community attitudes. Achieve Australia holds two positions on The Achieve Foundation Board and has provided seed funding for their philanthropic activities.

Achieve Australia is a 50% owner of Specialist Disability Accommodation provider, Inclusive Housing Australia (IHA). Achieve holds two positions on the Inclusive Housing Australia Board and participates in the IHA Audit and Risk Committee.

Our Board members are representatives from a range of sectors and professional backgrounds who are passionate about social inclusion for people with disability. They all have a deep understanding of how their experience and expertise can be translated into the disability sector. Our Board of Directors provide strategic guidance, expert advice and diligent governance. They are an invaluable resource in our work for people with disability.

Our Board is committed to ensuring that our organisation robustly manages the risks of modern slavery as an integral part of the Board's continued commitment to Achieve Australia's passion and purpose.



Governance, Structure and Operations (continued)

Executive Leadership Team:

Jo-Anne Hewitt
Chief Executive Officer (CEO)

Wally Phillips
Chief Financial Officer (CFO)

Daniel Kyriacou
Chief Operations Officer (COO)

Angela Johnston
Chief People Officer (CPO)

Sarah Archer
Chief Strategy Officer (CSO)

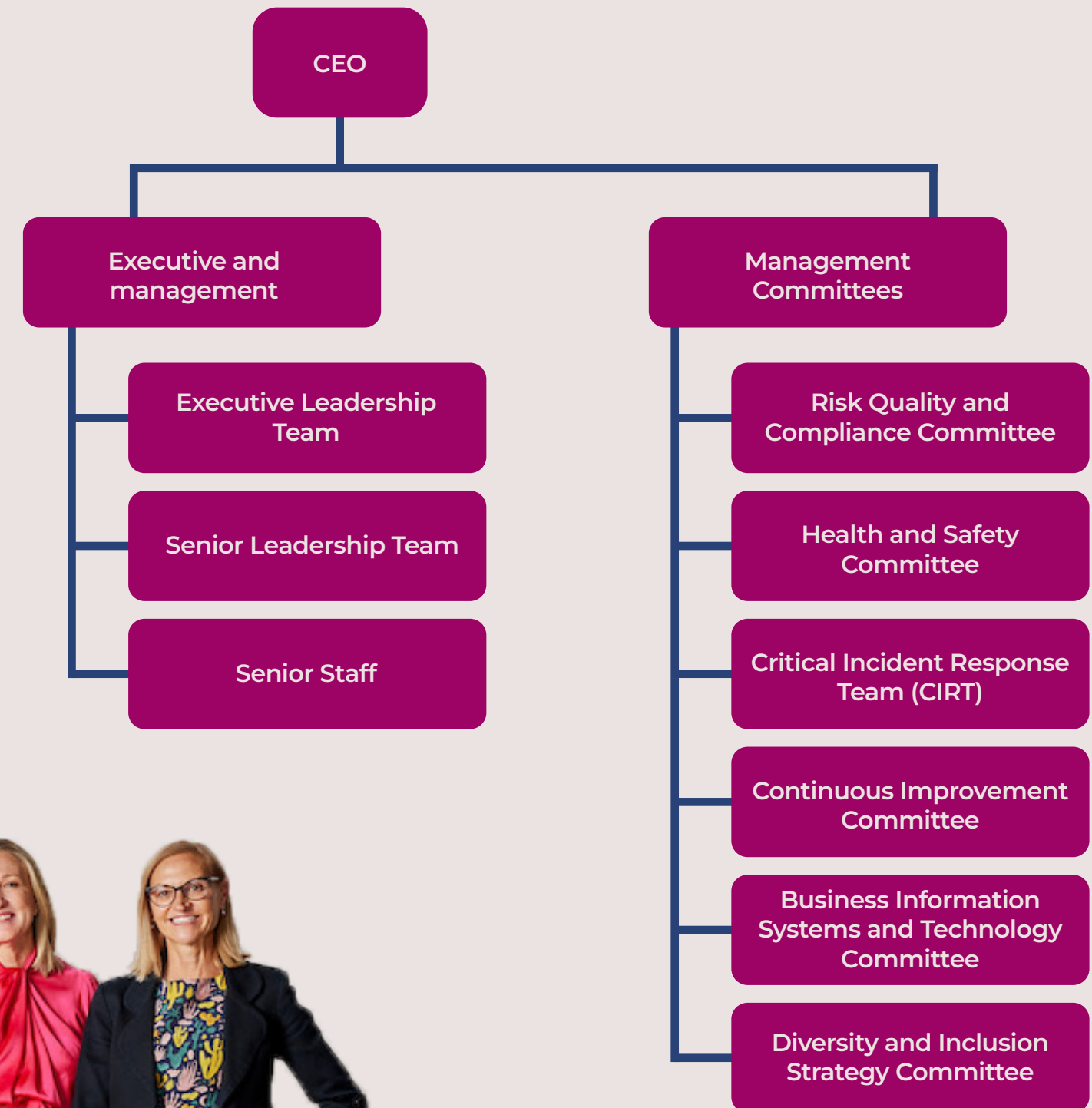
Paula Maher
Executive General Manager
Operations

Fiona Jackson
Executive General Manager
Communications and Marketing

Tina McManus
Executive General Manager Customer,
Practice and Quality

Grant Whitehorn
Executive General Manager Risk, Safety
and Audit

The Governance Structure for the
Executive and Senior Leadership Groups
is as follows:



Governance, Structure and Operations (continued)

Achieve Australia undertakes all procurement for the Achieve Group. The procurement of goods and services is guided by the following principles, as contained within the Achieve Australia Procurement Policy:

- Procurement is carried out by authorised staff
- Achieve Australia obtains goods and services that meet specification, are delivered on time at competitive prices, from financially stable suppliers
- Achieve Australia obtains the best value for money on a total cost basis
- Staff follow consistent procurement processes in accordance with this policy and any subsequent procedures
- Commercial, financial, legal and operational risk is reduced by rigorous negotiation processes
- Supplier relationship management is effective, collaborative, and focused on win-win outcomes
- Contracts are awarded only to suppliers who best meet the requirements outlined in Achieve Australia standard tender documents
- Procurement is ethical, and suppliers are selected and monitored to ensure compliance with modern slavery and ESG policy requirements.



Modern Slavery and Achieve Australia

Risks, Remediation and Due Diligence

Achieve Australia undertakes the following activities to identify, mitigate and monitor risks in relation to Modern Slavery:

- Achieve has both a group Human Rights and Modern Slavery Policy that applies to all staff and volunteers. These are available via the Achieve Intranet and are included as mandatory training
- The Procurement Policy includes Modern Slavery due diligence as part of the group procurement processes
- Achieve Australia has included Modern Slavery compliance as part of the standard agreement utilised when engaging with nursing and support staff agencies
- Achieve has included Modern Slavery compliance as part of the group Contractor Management Policy and Procedure
- The Achieve Whistleblower Policy and Procedure includes modern slavery considerations as part of the Whistleblower escalation process
- Modern Slavery and Environmental, Social and Governance have been included as agenda items on both Executive and Board level Committees to ensure oversight and ongoing management of these risks
- Achieve Australia has identified the main types of goods and services utilised within the organisation and source countries to understand where modern slavery risk sits within our supply chain
- Engagement of a third-party provider, One Brave Step, to support Achieve Australia to undertake an Environmental, Social and Governance materiality assessment.

Establishment of due diligence processes to address risks identified in supply chain mapping.

Risks, Remediation and Due Diligence (continued)

Additionally, Achieve Australia is currently working to undertake the following activities in the next 12 – 24 months:

- Review of the top 40 suppliers to Achieve Australia and assessment of Modern Slavery Risk including:
 - a) Supplier compliance in relation to the Modern Slavery Act
 - b) Supplier policies and procedures in relation to modern slavery
 - c) Supplier risk assessments of their own supply chain and the risks identified as part of these assessments
 - d) Whether there have been any known incidents of modern slavery within their supply chains
- Implementation of a supplier assurance mechanism whereby suppliers provide evidence of their modern slavery assurance practices and independently validated attestations around modern slavery
- Including Modern Slavery in the Achieve Australia internal audit program as part of a broader ESG internal audit
- Development of a Modern Slavery E-Learning module strengthen comprehension of modern slavery risk.

Where Achieve Australia identifies potential risks of causing, contributing to, or being directly linked to a form of modern slavery, our response will be managed by the through our Risk Management Framework and the following principles.

- Risk-based due diligence: meaning that the process of identifying and responding to modern slavery risks will reflect the applicable risk profile and operating environment, including:
 - a) activities undertaken in high-risk geographies;
 - b) purchasing goods or services considered at high risk of being linked to modern slavery;
 - c) operations in high-risk sectors; and
 - d) engagement with vulnerable populations at a heightened risk of modern slavery
- Fit for purpose: meaning that actions taken, and due diligence requirements imposed, will adequately address modern slavery risks whilst meeting organisational needs

- Balance: meaning that actions taken and due diligence requirements:
 - a) will be commensurate with Achieve Australia's capacity and that of its subsidiaries and suppliers to implement and monitor those actions; and
 - b) will not act as a disincentive for clients and suppliers to engage with the Achieve Australia
- Embedded in 'business as usual': meaning that actions to be taken and due diligence requirements will be included in.

Achieve Australia's existing operating model with clear roles and responsibilities, reporting requirements and management controls.

All staff, contractors, suppliers and clients are encouraged to report and appropriately escalate concerns about possible modern slavery to their manager or support worker at the earliest possible opportunity.

Continuous Improvement

At Achieve Australia, we aim for continuous improvement in managing and addressing modern slavery risks. We are committed to improving risk management processes to identify, evaluate, mitigate and monitor potential risk areas which could be exposed to human rights concerns including, modern slavery.

In line with this commitment, we have:

- Assessed our systems and controls to ensure our processes are aligned with our human rights obligations
- Reviewed, assessed and enhanced the maturity of our policies and procedures to align with evolving best practice and legal requirements
- Reviewed our remediation and grievance mechanisms to ensure consistency with the United Nations Guiding Principles on Business and Human Rights
- Maintained a consistent practice of communication and transparency in our efforts to combat modern slavery and protect individuals with disabilities, extending to all stakeholders, including service users, employees, support workers, and the broader community.

Achieve Australia recognises the importance of ensuring our business operations and supply chain operate with the continuous improvement imperative in mind. It is an ongoing initiative, one which involves a collaborative effort to prevent modern slavery practices.

Statement of Application and Authorisation

Achieve Australia Limited operates a centralised procurement function for all associated entities. As such this report applies to all Achieve Australia Limited controlled entities.

This statement was approved by the Board of Achieve Australia Limited.

