

Modern Slavery Statement 2024-2025

Head Office – 1 Fennell Street, North Parramatta NSW 2151

This statement covers the activities of The Northcott Society (Northcott)

ABN: 87 302 064 152 and its owned entities, in line with the Modern Slavery Act 2018 (Cth)

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About us

Our purpose, vision and values

Our purpose is to build an inclusive society where people can live the life they choose. We support people with disability to reach their full potential by providing services and support to promote a genuinely inclusive society.

Our vision is to be an inclusive organisation, growing support and connection where everyone thrives.

We are a values-based organisation that strives to foster a workplace culture based on our core values. We are:

- **Innovative** because we develop new ideas and solutions with creativity in anticipation of changing needs.
- **Respectful** because we believe that everyone's voice is unique and that they have the right to be heard.
- **Brave** because we have the courage to stand up for people with all abilities even in the face of adversity.



Northcott has offices throughout New South Wales (NSW), the Australian Capital Territory (ACT) and Southeast Queensland (Qld). Additionally (and not indicated here), we have over 100 disability homes, respite and specialist supported living services based in NSW and Qld.



What is modern slavery?

Modern slavery is the term used to describe situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Under Australian and international law, modern slavery includes offences such as human trafficking, forced labour, servitude, child labour, deceptive recruiting and debt bondage. It is estimated that there are approximately 40 million victims of modern slavery around the world today.

Sadly, modern slavery is not just an international issue. The evidence is clear that there are people in Australia who are also affected. In addition, Australia imports millions of dollars' worth of products which may have been produced by victims of modern slavery.

At Northcott, we continue to review our processes and communicate with our suppliers to understand the potential risks linked to our organisation.

We developed a training module for all new staff that covers the following topics:

- what is modern slavery
- how to identify modern slavery
- what to do if you suspect modern slavery.

In this statement we discuss how we have identified, assessed and addressed modern slavery risks around our work, suppliers and providers throughout the financial year 2024-2025.

Our Modern Slavery Statement has been prepared in accordance with the Australian Modern Slavery Act 2018 (Cth).



Message from our CEO

I am pleased to present Northcott's 6th Modern Slavery Statement. As a leading disability service provider, Northcott is committed to upholding human rights and ensuring the wellbeing and dignity of our customers remain at the forefront of everything we do.

We firmly believe that every person, everywhere, has the right to live free from all forms of modern slavery. Northcott supports national and global efforts to eradicate modern slavery across all sectors of business and the broader community.

Northcott acknowledges its obligations under the Modern Slavery Act 2018 (Cth) and reaffirms its commitment to identifying, addressing and mitigating modern slavery risks within our operations and supply chains.

We recognise that this commitment requires continuous improvement and ongoing review of our internal practices and those of our suppliers to ensure that our operations reflect the highest ethical and human rights standards.

A handwritten signature in black ink, which appears to read 'Liz Forsyth'. The signature is stylized and includes a flourish at the end.

Liz Forsyth
CEO, Northcott

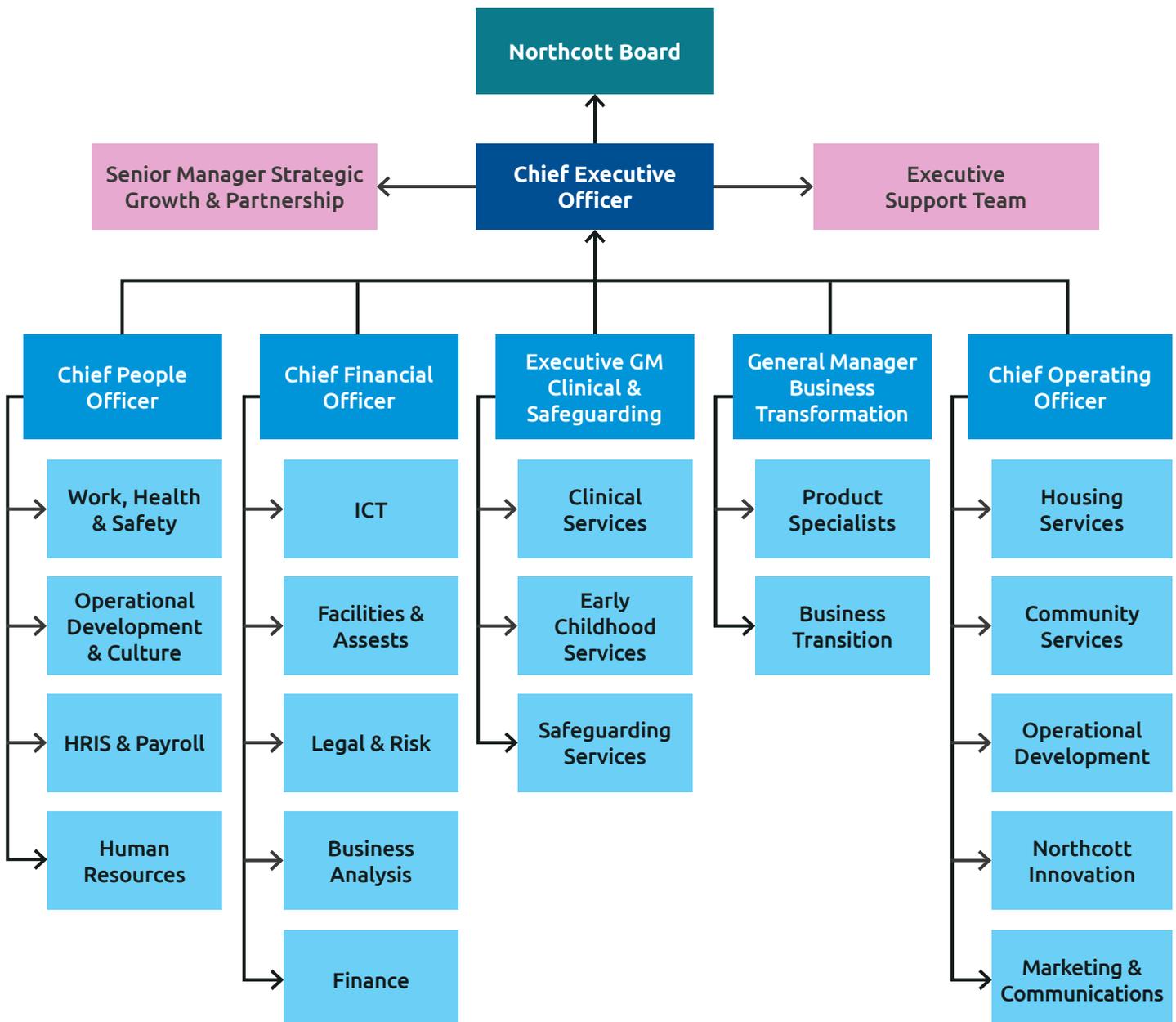
Our organisation

Northcott is a not-for-profit disability service provider that works with customers to realise their potential. We are striving to build an inclusive society where people can live the life they choose. We support people with disability to reach their full potential by providing services and support to promote a genuinely inclusive society. In FY24/25 5,410 people with disability were provided with support and services by Northcott. An additional 23,571 children and families were supported by Northcott Early Childhood Services, in our role as an NDIS Partner in the Community.

Organisational structure

Northcott's organisational structure is set out by our executive structure and their areas of responsibility.

Executive Leadership Team



Operations and structure

Northcott provides support and services to people with disability, their families and carers from multiple locations across NSW, Queensland and the ACT. All divisions and subsidiary businesses work together to provide our full-service offering.

All entities below are wholly owned subsidiaries of The Northcott Society and share main business functions such as human resources, learning and development, finance, payroll, contracts and procurement, fleet, facilities, IT and communication.

Northcott comprises of the following entities:



The Northcott Society
ABN 87 302 064 152



Northcott Innovation Ltd (NI)
ABN 45 601 575 633



SpineCare Foundation
ABN 98 003 427 272

The Northcott Group also has 3 other entities that still exist as legal entities, but which are no longer operating, those being Creativity Services Limited, Northcott Supported Living Limited and Montrose Therapy and Respite Services. None of those entities operated during the reporting period, hence they are not included in this Modern Slavery Statement.

- Creativity Services Limited – ABN 75 303 032 679
- Montrose Therapy and Respite Services – ABN 59 009 661 705
- Northcott Supported Living Limited – ABN 65 619 339 098

Services provided

Northcott provides:

- Short Stays
- NDIS Early Childhood Services
- Life Skills
- Housing and Supported Independent Living
- Individual Supports
- Sexuality and Relationships Education
- Skills 4 Life
- Skills 4 Work
- Social Work
- Therapy (including speech pathology, occupational therapy, physiotherapy and dietetics)
- Aged care
- Work & Study
- Aboriginal and Torres Strait Islander programs
- Orthotics and Custom Footwear
- Nursing
- Behaviour Support

Northcott Innovation provides the following:



- Accessible and inclusive co-design services
- Incubator and accelerator supports for solutions benefiting the disability community
- Consultative supports to organisations seeking to work alongside people with disability

Spinecare Foundation provides the following:



- Community and professional education
- Tertiary scholarships
- Research

Our supply chains

Northcott's supply chain supports the delivery of disability and community services across NSW, Queensland, and the ACT. The supply chain structure is primarily domestic, with some indirect international linkages through Tier 2 and Tier 3 suppliers.

Direct suppliers (Tier 1)

Northcott engages a wide range of suppliers in Australia to support service delivery, including:

Key category	Principal activities
Facilities and property services	Cleaning, property maintenance, builders, property refurbishments, furniture and equipment, pest control services, painters etc
Health and wellbeing	Personal Protective Equipment (PPE) (masks, hand sanitisers, gloves etc.), children's educational equipment and craft supplies
Medical, health and support services	Hygiene products, medical supplies and equipment, pharmaceutical, specialised therapy and welfare services and supported living expenses for our customers
Fleet services	Vehicle lease and maintenance
Labour	Labour hire such as nurses and support worker staff
Marketing	Marketing, advertising and fundraising services
Professional services	Legal, IT, HR, training and consultancy providers
Operational services	Recruitment agencies, transport services and catering
Corporate services	Office supplies and consumables

Indirect suppliers (Tiers 2–3)

Many Tier 1 suppliers are predominantly domestic; however, they often rely on international supply chains. Key areas of indirect sourcing include:

- medical consumables and personal care items sourced from manufacturing hubs in Asia
- IT hardware and electronics manufactured in high-risk geographies, then supplied via Australian distributors
- cleaning and hospitality products that may involve imported textiles, plastics or chemicals.

Procurement approach

Northcott uses a mix of preferred supplier arrangements, tendered contracts and ad-hoc purchasing. Procurement is centralised for major suppliers, while some purchasing decisions are made locally to meet immediate service needs.

Northcott's procurement is a combination of:

- centralised contracts for major or strategic suppliers
- preferred supplier arrangements for consistency and quality assurance
- localised purchasing for urgent or site-specific needs.

This supply chain structure means that while most Tier 1 suppliers are based in Australia and subject to Australian workplace standards, modern slavery risks may exist deeper in the supply chain, particularly in sectors such as healthcare products, IT hardware and facilities services.

While these deeper supply chain risks are not directly within Northcott's control, we address modern slavery risks by engaging reputable suppliers and ensuring they actively manage their own supply chains. Northcott also maintains preferred supplier arrangements to help minimise such risks.

Assessing and addressing risks and mitigations

We pride ourselves in promoting and advocating for the rights of all people. We strive to create a safe, supportive and inclusive environment for everyone who works with Northcott. To strengthen this statement and our commitment, over the last reporting period, we have reviewed Northcott's Modern Slavery Policy and Procedure.

Governance and management of modern slavery risks

Northcott has established a strong governance framework to oversee the management of modern slavery risks across its operations and supply chains. Oversight and guidance are provided through the Modern Slavery Working Group, which promotes collaboration, accountability and alignment with legislative requirements and organisational values. At Northcott, we are committed to upholding human rights and ensuring that our operations and supply chains remain free from modern slavery. Our approach focuses on open communication and engagement with stakeholders, regular and targeted staff training and continuous improvement in identifying, mitigating and responding to modern slavery risks. Through robust mechanisms for reporting and addressing concerns, we continue to strengthen awareness, capability and our overall commitment to a safe, ethical and responsible organisation.

Further, Northcott has sent (and will continue to send in the new reporting period) questionnaires to top suppliers querying their supply chains and any modern slavery risks that may be present within their organisations.

During the reporting period, all tenders issued to suppliers included the Modern Slavery Questionnaire as a key requirement in the selection of the successful tenderer.

We have revised the membership of the Modern Slavery Working Group to include representatives from all areas of business operations, ensuring a comprehensive understanding of modern slavery risks across the organisation.

Assessing effectiveness of actions

Over this reporting period, Northcott has developed a method of tracking uptake and finalisation of modern slavery training.

The Modern Slavery Working Group will continue to consider how Northcott can best assess the effectiveness of the above actions addressing the risk of modern slavery practices in its operations and supply chains.

We monitor our suppliers to ensure that they comply with their Modern Slavery obligations. This includes requesting reasonable access to suppliers' records for the purpose of verifying compliance.

Looking forward

Over the next reporting period we aim to:

- Maintain engagement with suppliers and internal stakeholders in more effective ways.
- Continuously ensure that modern slavery practices and requirements are adopted and upheld by suppliers during all future tender processes.
- Update our Modern Slavery Policy and Procedure as required.
- Promote the modern slavery practices to all Northcott staff through our intranet.
- Continue to drive compliance of due diligence processes across our organisation.
- Continue to ensure that all our onboarding staff are educated on the Modern Slavery Act and that they are made aware of the important role that they play in identifying risks with our employee base and suppliers.
- Continue to ensure all staff and visitors have the appropriate worker checks.
- Keep customers and staff aware of what we are achieving in the modern slavery space through our intranet and website.
- Strengthen relationships and partnerships that we have made with civil society organisations such as Anti-Slavery Australia and the National Partnership against Modern Slavery.
- Raise awareness of Australia's National Action Plan to Combat Modern Slavery 2020-25 throughout Northcott.

Disclosure note

This statement has been made on behalf of The Northcott Society (Northcott). This statement covers all entities owned or controlled by Northcott.

This Statement was approved by Northcott's Board of Directors on 25 November 2025 and signed by Kirsten Armstrong, Chair of Northcott's Board of Directors.



Kirsten Armstrong
Chair
Northcott Board