

New Horizons Enterprises Limited

ACN 002 066 604

trading as



**newhorizons**<sup>®</sup>  
wellbeing. done well.

**Wellbeing.**  
**it's what we do.**

Wellbeing isn't something you have, it's something you do.  
We support you to do it well.

# Modern Slavery Statement

## FY21

September 2021

<https://newhorizons.org.au/>

## A message from New Horizons Enterprises Limited

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As an enterprise founded on recognising basic human dignity, New Horizons takes its commitment to countering modern slavery practices seriously. One of the most endemic violations of human rights at a global level, organisations can no longer turn a blind eye to the exploitation of humans for commercial gain.

We acknowledge that our responsibility applies to our entire supply chain, beyond suppliers in our immediate line of sight. While we consider the risk of modern slavery within our operations and the first tier of our supply chain as low, we know we must do more, within our resources and capacity, to interrogate further. Since 1 July 2021, we have taken numerous steps to improve our awareness of modern slavery risks, as well as how to respond to those risks, and there has been significant improvement in a short space of time.

Our commitment over the coming 12 months is to progress the implementation of our due diligence processes and grievance mechanisms, and we are aiming to commence the development of processes that assess the effectiveness of our actions. Using the *United Nations Guiding Principles on Business and Human Rights*, we endeavour to implement management processes and controls to integrate our findings, track our progress and to provide effective relief to individuals and communities impacted by modern slavery.

We are proud to play an active role in the fight to end this abuse of human rights.



Peter Howell

Chairman




25 October 2021



Richard Gregg

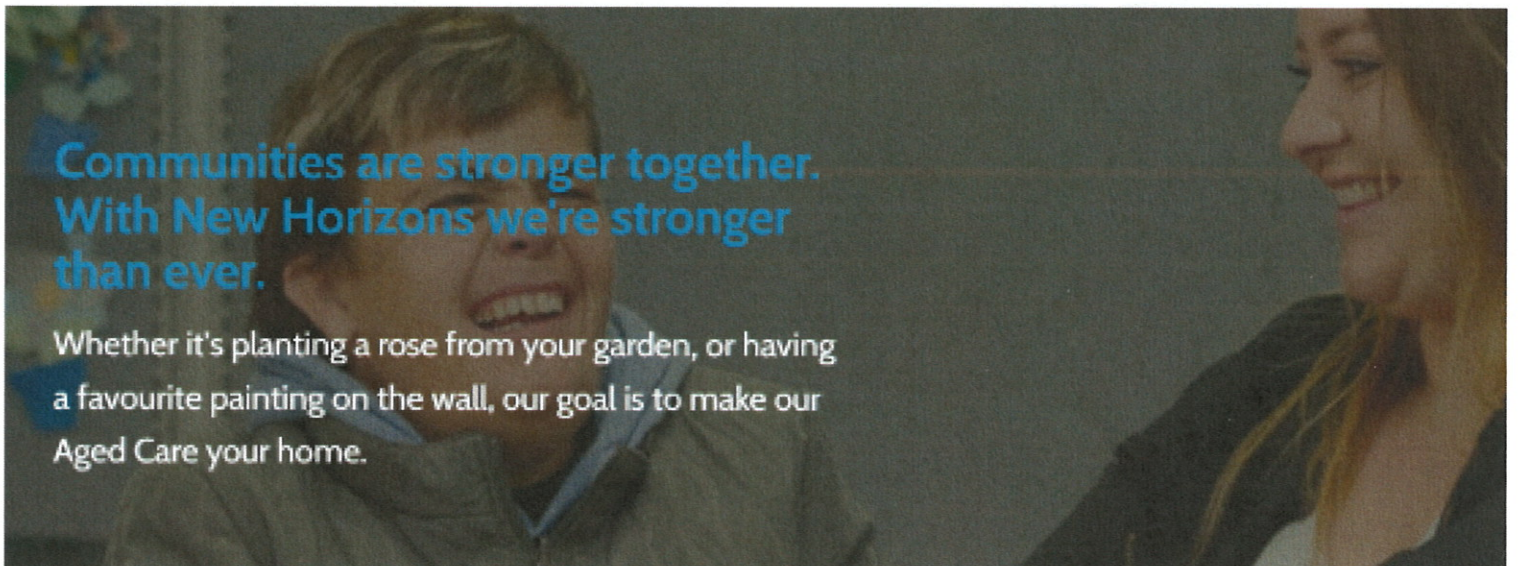
Chief Executive Officer



25 October 2021

**Communities are stronger together.  
With New Horizons we're stronger  
than ever.**

Whether it's planting a rose from your garden, or having a favourite painting on the wall, our goal is to make our Aged Care your home.



# 1 Overview of New Horizons' modern slavery tracking

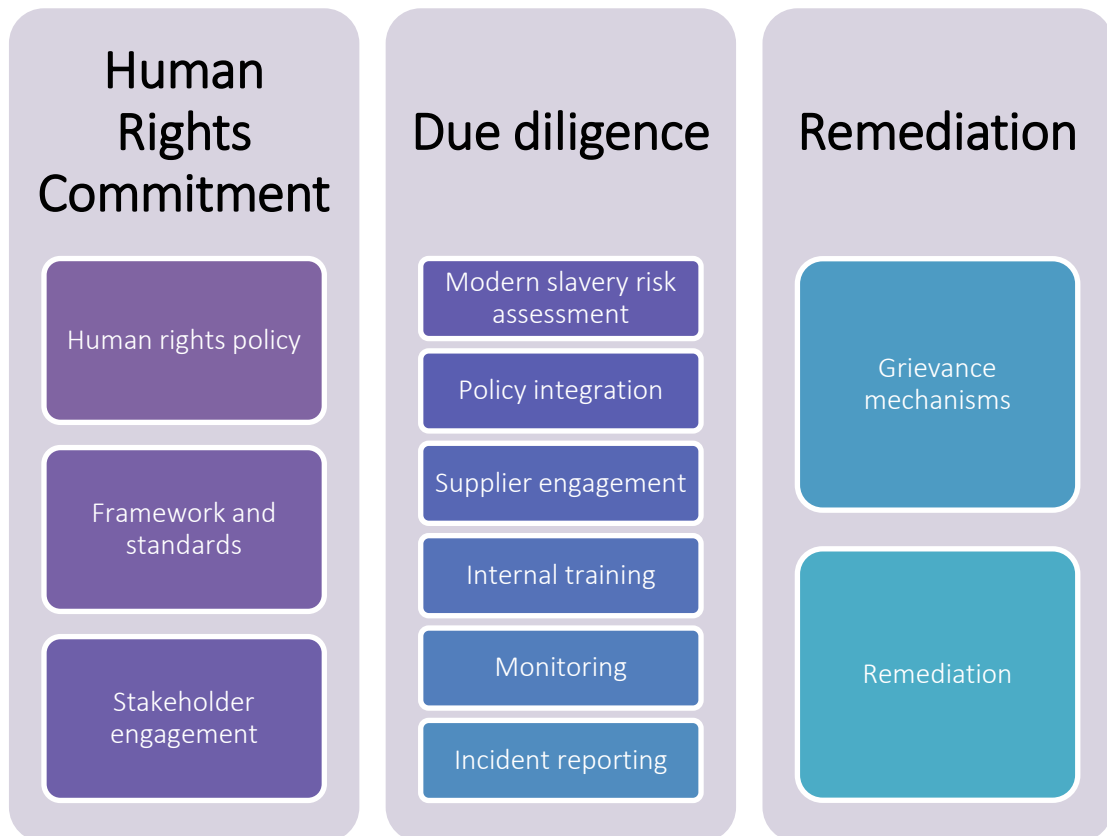
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New Horizons Enterprises Limited ACN 002 066 604 (**NH**) is committed to the continuous work necessary to ensure that there are no modern slavery practices within our operations and supply chains.

We recognise the importance of ongoing due diligence in identifying and appropriately addressing the risks of modern slavery practices within our operations and supply chains.

After reviewing the nature of our business, we consider that our direct impact in relation to modern slavery practices is low. As a medium sized entity with approximately 1,410 employees, the resources available to implement and monitor our management systems and controls is limited. Notwithstanding, we are committed to developing a robust, three-tiered framework which focuses on our human rights commitment, due diligence and remediation as illustrated in the image below.

Our developing modern slavery response is informed by the *United Nations Guiding Principles on Business and Human Rights*. While we are in the early stages of acting to address the modern slavery risks we have identified, we endeavour to implement management processes and controls to integrate our findings, track our progress and to provide effective remediation to individuals and communities impacted by modern slavery.





## 2 Our structure, operations and supply chain

### Who are we?

The reporting entity of this Modern Slavery Statement is New Horizons Enterprises Limited ACN 002 066 604.

NH is an unlisted not-for-profit company operating throughout NSW.

It has its headquarters and registered office in North Ryde, NSW and has over 25 offices located across the State as shown in the image below.

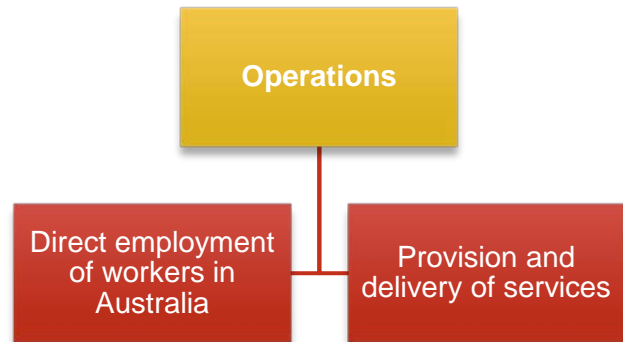
NH is an Australian public company limited by guarantee. It is a standalone entity and as such, does not control any other entities.



### Our operations

NH operates a charitable business that provides services that enhance the wellbeing of vulnerable and disadvantaged people in communities across NSW.

All NH's operations are conducted in Australia and are divided into two categories: employment of workers in Australia and the provision and delivery of its services to customers.



### *Direct employment of workers in Australia*

On 30 June 2021, NH had a total workforce of approximately 1,410 employees, all of whom were employed in Australia in accordance with Australian labour laws. NH employees either work in one of its offices in NSW or as part of its Australian Disability Enterprises: 'Wellbees' and 'Packable'.

Through its Wellbees and Packable enterprises, NH provides meaningful employment opportunities for people with a disability.

The Wellbees enterprise operates to provide quality Australian-made frames for bee hobbyists and commercial beekeepers meanwhile, the Packable enterprise provides labelling, assembly, shrink wrapping and packaging services.

### Provision and delivery of services

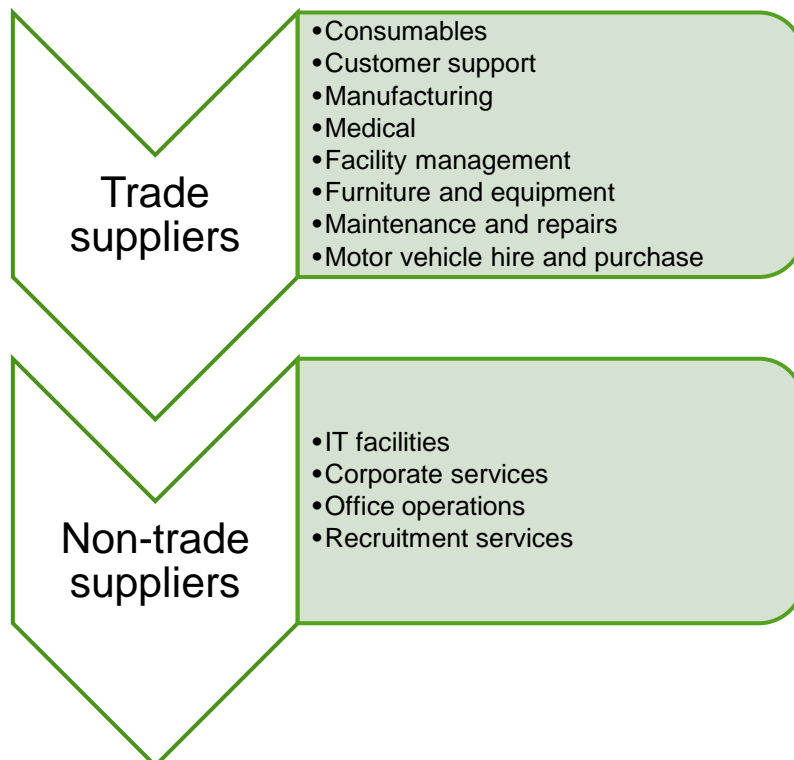
NH provides its services to a vast range of customers including people with a disability, mental health concerns, those who are aged, people at risk of homelessness, humanitarian entrants, youth, and Indigenous Australians.

The key services of NH's operations include:



### Our supply chain

The main categories of goods and services procured during the Reporting Period are:



## Location of New Horizon's suppliers



In the Reporting Period, 99% of New Horizons' suppliers were based in Australia



- United States of America
- Australia
- China
- United Kingdom
- New Zealand

### Australia

- Consumables
- Customer support
- Manufacturing
- Medical
- Facility management
- Furniture and equipment
- Maintenance and repairs
- Motor vehicles
- IT services
- Corporate services such as legal, accounting and finance
- Office operations such as cleaning and maintenance
- Recruitment services

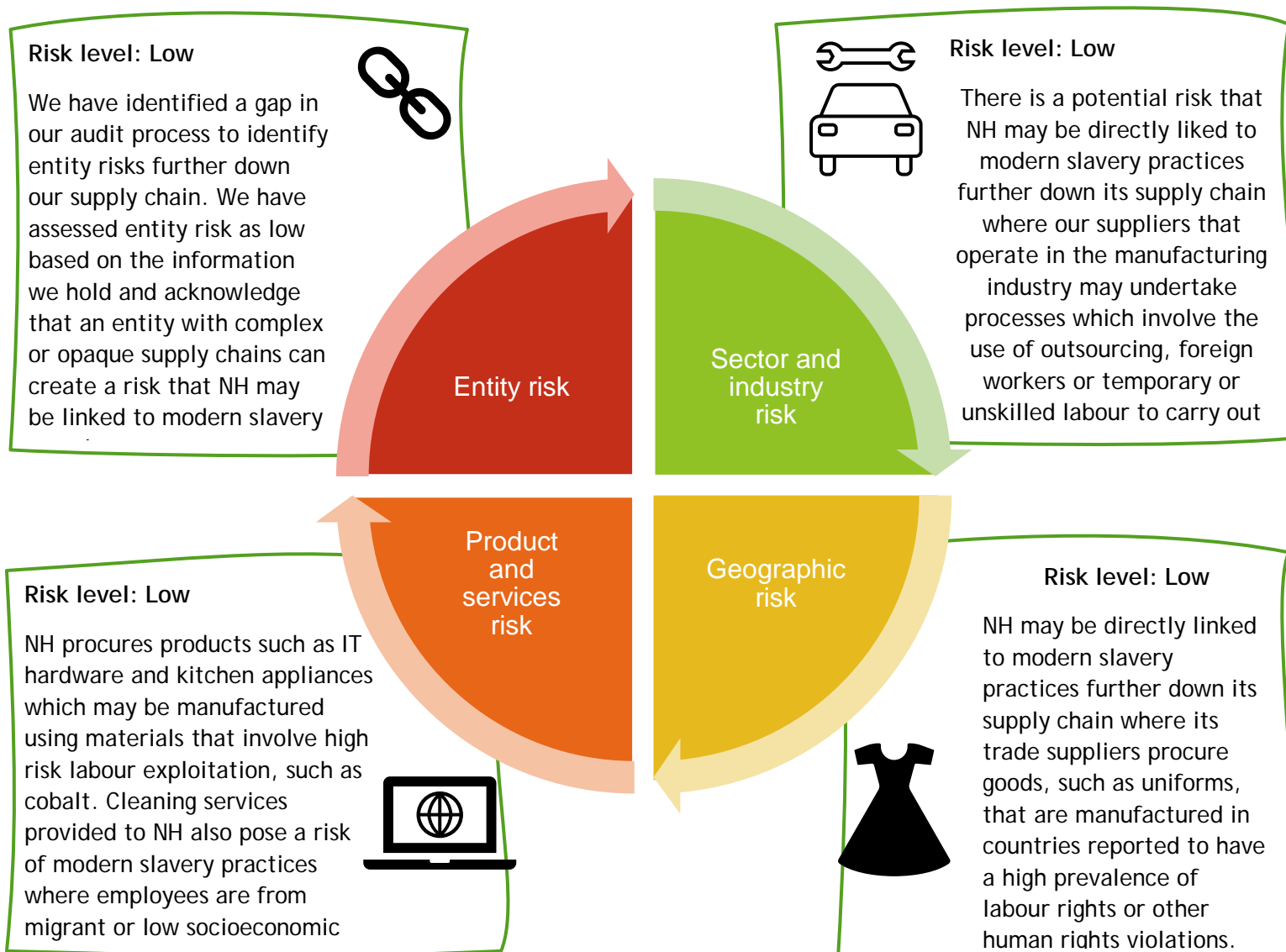
### 3 Our modern slavery risks

NH acknowledges the complexity of modern slavery risk and the ways it can manifest in operations and supply chains. In 2021 NH undertook an assessment of the modern slavery risks within our operations and first-tier suppliers. We acknowledge that modern slavery risks exist within our industry however, given the size of NH and our large supplier base, we do not have the resources to examine modern slavery risks beyond our first-tier suppliers. Notwithstanding this limitation, we are looking to do our best as we further improve our modern slavery processes and engagement with our suppliers.

We are focused on increasing supplier engagement to assist us and our suppliers in identifying modern slavery risks. In instances where our suppliers have published their own Modern Slavery Statement, we have considered these in undertaking our assessment.

99% of NH's suppliers are based in Australia and the provision and delivery of NH services and the employment of our staff occur in Australia. We consider the risk of modern slavery within our operations and the first tier of our supply chain as low.

We recognise NH may be directly linked to modern slavery practices through the various tiers of our supply chains. These risks are identified below:



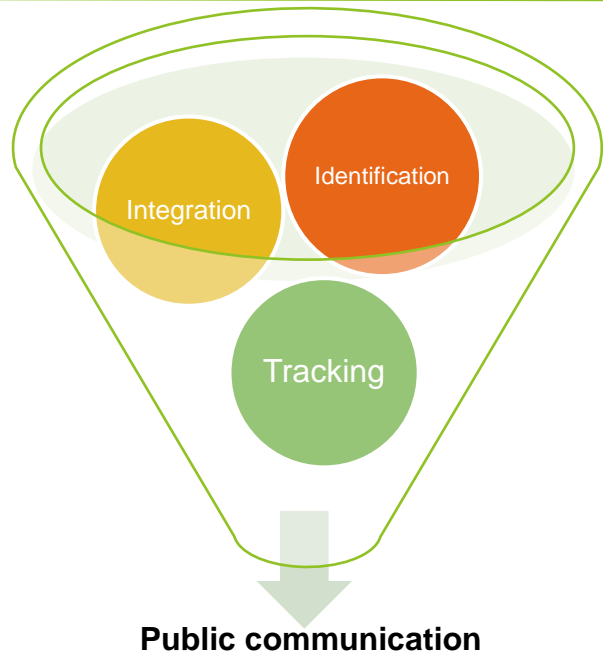
# 4 Our action

## Due diligence

NH is committed to preventing modern slavery practices in its operations and supply chains. We recognise the importance of modern slavery due diligence as an ongoing process and as a vital part of our role to prevent modern slavery practices.






To identify and assess actual and potential human rights impacts within our operations and supply chains, NH introduced a new Supplier Agreement during the Reporting Period. The Supplier Agreement is provided to all new suppliers and sets out terms on dealing with Modern Slavery. The terms of the Supplier Agreement require a new supplier to acknowledge that it has no knowledge of Modern Slavery in its own operations or supply chain and that it will take reasonable steps to identify the risk of and prevent the occurrence of Modern Slavery in its operations and supply chain.

All NH labour is sourced locally. We have internal policies in place that comply with Australian and international labour laws such as our *Inclusion and Diversity Policy*.



NH does not yet have processes in place to integrate and track modern slavery risks within our operations and supply chains. We are putting into place management systems and controls to address impacts through internal training on modern slavery and incident reporting. Part of those processes include obtaining professional advice.

We are also in the process of implementing controls to monitor our progress of implementation actions on a regular basis.

 <p><b>Identification</b></p> <ul style="list-style-type: none"> <li>• Supplier Agreement for new suppliers addressing Modern Slavery</li> </ul>	 <p><b>Integration</b></p> <ul style="list-style-type: none"> <li>• We are in the process of implementing compulsory internal modern slavery training and processes for incident reporting</li> </ul>	 <p><b>Tracking</b></p> <ul style="list-style-type: none"> <li>• We are working towards implementing an internal audit of our supplier screening processes to monitor our progress</li> </ul>	 <p><b>Public Communication</b></p> <ul style="list-style-type: none"> <li>• Publishing our FY2021 Modern Slavery Statement</li> </ul>
			



## Remediation

NH recognises that, while we do not directly cause or contribute to modern slavery, we may be linked to modern slavery practices by a business relationship.

We acknowledge that given the size of our business, NH has limited leverage to influence some of our larger suppliers to change their behaviour. Notwithstanding, NH is committed to using leverage we do have to work with suppliers that have caused adverse impacts to prevent or mitigate harm and its recurrence.



NH has implemented a Whistleblower Protection Policy which aims to provide a reporting and investigative mechanism that is objective, confidential and independent, and protects Whistleblowers from reprisal. The Policy applies to all current and former employees, volunteers, contractors and suppliers of NH and their relatives.

The Integrity Hotline is also available to individuals covered by the Policy and who wish to remain anonymous. The Hotline is operated by an external and independent organisation whose staff are trained in confidential reporting.

Our Whistleblower Protection Policy does not explicitly identify Modern Slavery as a wrongdoing which may be reported. Part of our modern slavery response will involve updating our Whistleblower Protection Policy to rectify this.

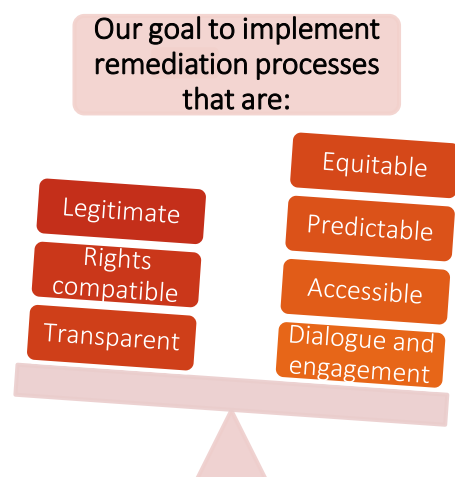
We recognise there are gaps within our current processes and as a result, NH does not currently provide effective remediation for individuals and communities affected by

modern slavery practices and other human rights abuses.

NH commits to addressing human rights grievances. We are currently in the process of developing a robust modern slavery response framework which will be introduced over the next 12 months and will provide more effective grievance mechanisms and avenues for affected individuals and communities to come forward. Some of these mechanisms are listed in the diagram below.



Our developing strategic approach to remediation is informed by Principle 31 of the *United Nations Guiding Principles on Business and Human Rights* and aims to provide grievance mechanisms that are 'effective' in so far as they can be characterised as being:



## 5 Assessing the effectiveness of our action

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NH's monitoring and reporting program is currently under development. Our objective is to operationalize the fundamental human rights due diligence principles in line with the *United Nations Guiding Principles on Business and Human Rights*.

We recognise the process of developing a robust, effective, and sustainable monitoring program requires time and resources.

Our focus this year has been to understand where we are, implement a framework for awareness of modern slavery risks in the workplace and to identify and address the risks as best as we are able to. These initial steps will assist us in building a strong foundation to monitor the effectiveness of our actions.



## 6 Process of consultation

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Consultation was not necessary in the preparation of our Modern Slavery Statement as NH is a standalone entity.



## 7 Any other relevant information

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### Continuous improvement: planned next steps

Given the nature of NH as a not-for-profit business, NH does not have significant resources to channel to Modern Slavery issues or look in detail at downstream supply chains of its first-tier suppliers. This could also impact on NH's ability to implement organisational change promptly.

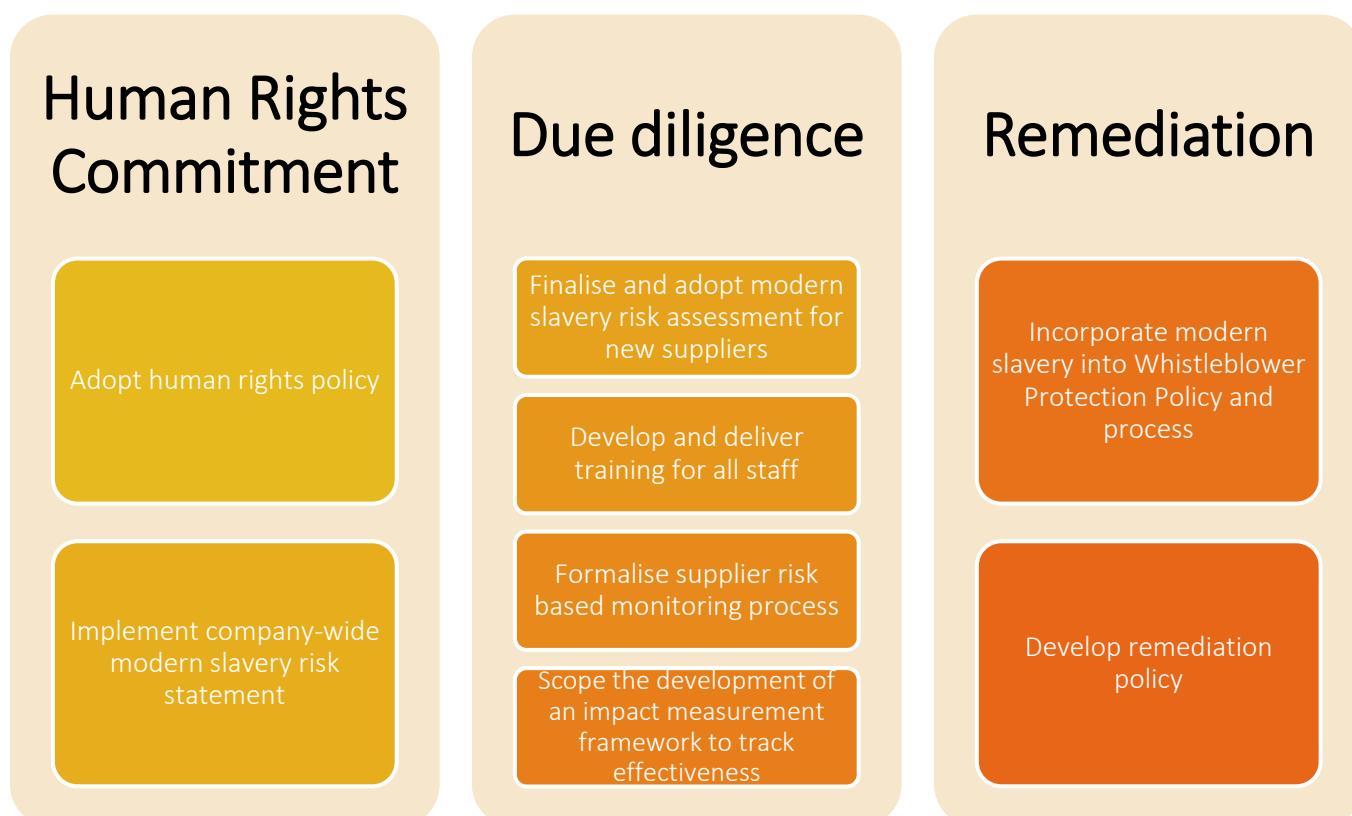
NH is also limited in what pressure it can exert on suppliers as most of its significant suppliers are large entities.

Despite these limitations, NH is seeking advice and developing its processes in a way which aligns with its resources and abilities. NH is committed to managing Modern Slavery issues in an appropriate manner given the low level of risk assessed for Modern Slavery in its operations and supply chains.

Since 1 July 2021, NH has taken numerous steps to improve its awareness of Modern Slavery risks and how to respond to those risks. There has been significant improvement in a short space of time and NH is committing itself to implementing a Modern Slavery framework and a process of continuous improvement to address Modern Slavery issues in its operations and supply chains.

Over the next year, NH will progress the implementation of its due diligence processes and its grievance mechanisms. NH aims to commence developing processes to assess the effectiveness of its actions.

The table below provides an overview of NH's priorities for FY22.



## Statement from New Horizons' Board Chair

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This Modern Slavery Statement for the Financial Year 2021 was approved by the Board of New Horizons Enterprises Limited (ACN 002 066 604) on 25 October 2021.



Peter Howell, Board Chair

25 October 2021





For queries relating to this statement:

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September 2021.