

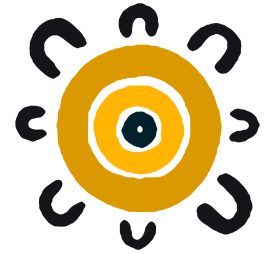


ABORIGINAL CULTURAL IMMERSIONS

BLUE TONGUE MANAGEMENT PTY LTD

Established 1996

ABN 52 678 467 895 ACN 678 467 895
MLC Level 57 25 Martin Place
Sydney, NSW, 2000



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MODERN SLAVERY STATEMENT

Blue Tongue Management Pty Ltd trading as Aboriginal Cultural Immersions
Reporting Period: 1 July 2024 – 30 June 2025

Prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth)

1. Introduction

This Modern Slavery Statement (“Statement”) is made by Blue Tongue Management Pty Ltd trading as Aboriginal Cultural Immersions (“ACI”, “the Company”, “we”, “our”) pursuant to section 13 of the Modern Slavery Act 2018 (Cth).

This Statement outlines:

- The structure, operations and supply chains of ACI
- The risks of modern slavery practices in our operations and supply chains
- The actions taken to assess and address those risks
- How we assess the effectiveness of those actions
- The consultation process undertaken in preparing this Statement

ACI recognises that modern slavery constitutes a serious violation of fundamental human rights and is committed to operating with integrity, transparency and respect for the rights and dignity of all people.

2. Reporting Entity

Blue Tongue Management Pty Ltd trading as Aboriginal Cultural Immersions
ABN/ACN: 52 678 467 895
Registered Office: 55 WELLINGTON SQUARE, NORTH ADELAIDE, 5006, SA
Entity Structure: Proprietary Limited Company
This Statement covers Blue Tongue Management Pty Ltd and Aboriginal Cultural Immersions.

3. Our Structure, Operations and Supply Chains

3.1 Organisational Structure

ACI provides cultural education, immersive learning experiences and advisory services across Australia. Governance oversight is provided by the Director, who is responsible for ensuring compliance with statutory obligations and ethical business practices.

Operational management is undertaken by executive leadership and program managers who oversee program delivery, contractor engagement and supplier relationships.

3.2 Operations

ACI's principal activities include:

- Delivery of Aboriginal cultural immersion programs
- Cultural capability and awareness training for corporate and government clients
- Educational programs for schools and tertiary institutions
- On-Country experiences facilitated by Aboriginal Elders and Knowledge Holders
- Cultural consultancy and advisory services

Our operations are primarily based in Australia and delivered in partnership with Aboriginal businesses and communities.

3.3 Supply Chains

ACI's supply chains are predominantly domestic and service-based. They include:

- Aboriginal Elders, facilitators and cultural consultants (contracted)
- Aboriginal and Torres Strait Islander performers
- Artist and performer management and administrative service providers
- Educational workshops
- Art Supplies for workshops

Art supplies procured by ACI, may have upstream international supply chains.

4. Modern Slavery Risks

ACI understands modern slavery to include practices such as forced labour, debt bondage, servitude, deceptive recruitment, human trafficking and child labour.

4.1 Operational Risk

ACI assesses the risk of modern slavery occurring within its direct operations as low due to:

- An Australian-based workforce
- Transparent contracting arrangements
- Direct engagement with Aboriginal contributors
- Clear remuneration structures
- Strong relationship-based community engagement

4.2 Supply Chain Risk

Potential modern slavery risks may arise indirectly within extended supply chains, particularly in:

Overseas manufacturing of Art Supplies
Information technology hardware manufacturing

These sectors are globally recognised as carrying higher inherent risks due to complex supply chains and labour-intensive production environments.

5. Actions Taken to Address Modern Slavery Risks

During the reporting period, ACI implemented the following measures:

5.1 Governance and Policy Framework

- Adoption of a Modern Slavery Policy endorsed by the Board.
- Integration of ethical procurement principles into organisational policy.
- Inclusion of compliance obligations within supplier engagement processes.

5.2 Supplier Due Diligence

- We work with Australian-based and Aboriginal-owned suppliers
- We purchase all art supplies from Monte Marte International Pty Ltd, with their own extensive Supplier Code of Conduct <https://www.montmarte.com.au/pages/supplier-code-of-conduct>

5.3 Ethical Workforce Practices

- Written agreements for contractors and facilitators.
- Transparent and fair remuneration practices.
- Prompt payment processes.
- Commitment to culturally safe and respectful working environments.
- Zero tolerance for coercion, exploitation or unsafe labour practices.

5.4 Awareness and Leadership Oversight

- Executive-level oversight of modern slavery risk management.
- External awareness discussions with Aboriginal businesses and contractors regarding ethical supply chains and human rights responsibilities.

6. Assessing Effectiveness

ACI assesses the effectiveness of its modern slavery risk management framework through:

- Periodic review of supplier relationships
- Monitoring and addressing complaints or grievances
- Annual governance review of policies and procurement practices
- Ongoing consultation with Aboriginal community partners

Given the size and nature of ACI's operations, our approach is proportionate, risk-based and subject to continuous improvement.

7. Consultation

This Statement was prepared in consultation with:

* Aboriginal Contractors

Where applicable, consultation has occurred with any controlled entities to ensure consistency of approach.

8. Continuous Improvement Commitments

ACI acknowledges that modern slavery risk management is an evolving process. During the next reporting period, ACI intends to:

- Increase engagement with verified, ethical and Aboriginal-owned suppliers
- Develop a formal supplier risk assessment questionnaire
- Developing our Innovative Reconciliation Action Plan in conjunction with Reconciliation Australia.
- Establish a documented grievance and reporting mechanism
- Strengthen the record-keeping of supplier due diligence

9. Approval

This Modern Slavery Statement was approved by the Director of Blue Tongue Management Pty Ltd trading as Aboriginal Cultural Immersions in accordance with section 13 of the Modern Slavery Act 2018.

Signed for and on behalf of Aboriginal Cultural Immersions:



Name: Darrel Baird
Title: Director
Date: 3rd March 2026