

Modern Slavery Statement

Year ending 30 June 2025



We acknowledge Aboriginal and Torres Strait Islander peoples as the traditional owners of this country, and pay respect to Elders past, present and future. We value diversity and inclusivity.

We're committed to providing respectful, quality and accessible services to all.



Introduction

Uniting Communities Inc. (“Uniting Communities) is an inclusive not-for-profit organisation working alongside more than 80,000 South Australians each year as they strive for bright futures and great lives.

Uniting Communities services, advocacy and community building activities are central to achieving our aim of helping people in the community to realise their potential and live the best lives that they can. We believe that we must help people to build the skills needed to overcome adversity; connect people who are vulnerable to communities which can offer support and care; and create better social and public policy by advocating for change and developing solutions to address inequality and disadvantages.

Uniting Communities offers more than 90 services from 65 sites across metropolitan and regional South Australia and has been providing this support since 1901.

For more information on our diverse range of services, please refer to our website www.unitingcommunities.org

We are pleased to submit our third statement on how Uniting Communities assesses and addresses Modern Slavery risks within our operations and supply chains.

Modern Slavery Act Mandatory Reporting Criteria

1. Reporting entity
2. Structure, Operations and Supply Chains
3. Risks of modern slavery in the operations and supply chains
4. Actions taken to assess and address modern slavery risks, including due diligence and remediation processes
5. How do we assess effectiveness of actions being taken to assess and address modern slavery risks
6. Consultation
7. Further Information

Each of these criteria have been addressed as detailed in this statement.



**bright
futures**

I. Reporting Entity

Uniting Communities Inc, trading as Uniting Communities ABN 33 174 490 373 “Uniting Communities”
43 Franklin St, Adelaide SA 5000

Uniting Communities Inc is the reporting entity for our modern slavery requirements for which we are reporting details of on a consolidated (group) basis. Accordingly the “included entities” are the subsidiaries outlined below:

Subsidiaries:

Erwin Vogt Foundation Incorporated (as Trustee for Erwin Vogt Foundation)	ABN 67 393 960 361
Erwin Vogt Foundation (Charitable Trust)	ABN 13 310 092 237

2. Structure, operations and supply chain

Structure

Uniting Communities is a South Australian incorporated association and registered with the Australian Charities and Not-for-profits Commission.

Uniting Communities including its subsidiaries (outlined in Criteria 1) and related entities, are governed by a common Board who are united in working to help all South Australians to live their best lives.

Led by our Chief Executive and Executive Team, Uniting Communities offers more than



90

Services at



65

sites across metropolitan and regional South Australia

Other related entities

In addition to the above, there remain dormant entities within the Uniting Communities group, details of which are publicly available on the Australian Charities and Not for Profits Commission (ACNC) website www.acnc.gov.au

Goodwill Stores of South Australia Inc	ABN 16 069 289 133
Goodwill Industries of South Australia Inc	ABN 93 771 363 027
The Kate Cocks Memorial Girls Home Inc	ABN 72 142 300 937
The Kate Cocks Memorial Family Services Inc	ABN 39 014 494 593
Lifeline and Youthline Inc	ABN 12 147 464 698
Kuitpo Colony Inc	ABN 73 049 181 344
Central Mission Homes for the Aged Inc	ABN 51 162 501 093
Central Mission Homes for Children Inc	ABN 57 740 575 294
Forsyth Foundation Inc	ABN 36 604 828 795

2024 OUR IMPACT IN NUMBERS

Who works at
UNITING
COMMUNITIES?

1,149 employees
worked to enrich lives and unite
communities across South Australia.

340 volunteers
give their talents and time to
support our life-changing work.



INDIVIDUALS AND FAMILIES

2,638 people from
98 countries accessed free
advice and support through
UC Law Centre to resolve
a range of legal issues.



534 parents from
across SA took part in
educational programs to
strengthen their family's relationships.



202 families and
45 young people found
support through UC's
family mental health
counselling service.



160 families were
coached to build their
resilience and family
bonds through the Family
program.



92 people got
support to overcome
loneliness and build
more meaningful
community connections.



33 families have
developed parenting
skills and reunified
with their children
through Newpin.



YOUNG PEOPLE

420 regional young
people found support to
improve their wellbeing
through headspace
Mount Gambier.



131 young people
avoided homelessness
through Ruby's, and **74%**
were successfully reunified
with their families.



397 young people and
their families got support on
the journey to recover from
alcohol and other drug use
through Streetlink.



170 young people
accessed healthcare through
the Streetlink Medical Clinic,
including Mental Health
Care plans for **31** patients.



71% of young
people connected with
Streetlink reported
improved quality of life
following treatment.



OLDER PEOPLE

3,949 older people were
supported to live well at home
and in their community with our
Community Aged Care services.



191 Residential Aged Care
rooms across Aldersgate and
Murray Mudge provided a safe and
comfortable home for older people.



PEOPLE WITH DISABILITIES

105 NDIS participants
engaged us to help build their
skills, achieve their goals, and
support their independence.



22 participants joined
the new Individualised Living
Service to get support with
building a more independent life.



PEOPLE ON THE PATH TO RECOVERY

1,436 people got
support on their path to
recovery through New
ROADS counselling and
residential services.



82% of people who
took part in New ROADS
said their health, wellbeing,
and awareness of their
substance use improved.



PEOPLE DOING IT TOUGH

36,408 phone calls
to Homeless Connect SA
from people and families
seeking support out of
homelessness.



4,675 people got
emergency assistance to
get through tough times
through our Financial
Wellbeing program.



589 people received
financial support to build a life
free from intimate partner
violence through the federal
Escaping Violence Payment.



PEOPLE EXPERIENCING CRISIS

39,925 calls from
people across Australia were
answered by Lifeline Adelaide's
Crisis Supporters.



13,575 hours
were volunteered at
Lifeline Adelaide – up **7%**
from the previous year.



PEOPLE WITH COMPLEX MENTAL HEALTH NEEDS

13 residents with
complex mental health needs
got support through Chrysalis
Forensic Mental Health Service.



100% of participants
received case management
support to prepare for living
independently after Chrysalis.



77% of participants
moved into stable long-term
accommodation in the
community after the program.



ABORIGINAL AND TORRES STRAIT ISLANDER PEOPLE

364 Aboriginal people found
culturally-safe support to change
their relationship with alcohol and
other drugs through Aboriginal
Community Connect.



300 group sessions and
events delivered through
Aboriginal Community Connect,
helping people stay connected to
culture and community.



100% of people
engaged with the Kurlana
Tampawardi program moved
from homelessness into stable
long-term accommodation.



70% of people
participating in Kurlana
Tampawardi found
meaningful education or
employment opportunities.



LGBTQIA+ PEOPLE

160 LGBTQIA+
people and their loved
ones supported through
Bfriend, including **16%**
new participants.



2,730 LGBTQIA+
people and allies found a
warm welcome at **22**
community events
supported by Bfriend.



87% of Bfriend
participants reported an
improved sense of
community, and **82%**
improved social connection.



NET ZERO 2035

9% reduction in carbon
emissions from the previous
financial year, and **656** tonnes
of Australian Carbon Credits
purchased from local sources.



20% renewable energy
used at U City – up from
17% the previous year to
maintain our **4.5** energy
efficiency rating (NABERS).



U CITY

Celebrated **5** years
of U City – our diverse,
sustainable and inclusive
community in the city.



9,983 hotel guests
stayed a total of **6,467**
nights in U City's accessible
furnished apartments.



419 events hosted
in our state-of-the-art U City
Function Centre, attended
by more than **30,000** guests.



56 residents call U City
Retirement Village home,
including **15** couples and
26 single residents.



 **UNITING
COMMUNITIES**

Supplier relationships

For the year ended 30 June 2025, Uniting Communities identified that 99% of directly engaged Tier 1 suppliers (directly contracted suppliers) are based in Australia, with a limited number of suppliers based in jurisdictions including the United States, the United Kingdom and Singapore. Uniting Communities engages various suppliers in the areas of, but not limited to:

	Food and beverages, perishable and non-perishable, from distributors, supermarkets and local providers
	Janitorial supplies from distributors, supermarkets and local providers
	Office supplies from distributors and other local providers
	Electrical goods and IT equipment
	Motor vehicles
	Managed linen service that includes hire and laundering of linen, from a local provider
	Facilities maintenance services: regular or ad hoc property and equipment maintenance from local providers
	Medical equipment and consumables from distributors and local providers
	Contingency labour hire staff

Uniting Communities will continue to delve deeper into our supply chains beyond Tier 1 in future reporting periods and recognises that locations of suppliers at Tier 2 and Tier 3 levels¹ may be in international jurisdictions, resulting in an increased supply chain risk profile.

3. Risks of modern slavery in the operations and supply chains

Uniting Communities understands that assessing its modern slavery risks in its operations and supply chain is an ongoing exercise which it is continuing to evolve and enhance each reporting period.

Uniting Communities undertakes its supply chain risk assessments utilising a risk matrix, which utilises data from sources such as the Walk-Free Foundation's Global Slavery Index, the Corruption Perceptions Index, the NSW Anti-Slavery Commissioner's Procurement Risk Management Framework and the US Department of Labour – List of Goods Produced by Child Labour and Forced Labour.

Our risk matrix assesses suppliers against risk factors such as:

- Geographic risks – specific risks associated with a certain country or region, e.g. Russia, which is a high-risk country for modern slavery.
- Product / services risks – specific risks associated with a particular product or service, e.g. the production of linen and cotton carry heightened modern slavery risks.
- Entity-specific risks – specific risks associated with particular entities, e.g. those subject to sanctions.
- Sector / industry risks – specific risks associated with particular sectors / industries, e.g. the solar panel production industry carries a heightened risk.

Supply chain risks

Uniting Communities acknowledges that during this reporting period, we have undertaken due diligence steps limited to our Tier 1 suppliers, and that risks of modern slavery are more likely to present deeper in our supply chains. Utilising the risk assessments under the risk matrix, Uniting Communities has undertaken an initial "cause, contribute to, or directly linked to" assessments of its supply chain risks.

This involves assessing modern slavery risks associated with our operations and supply chains and whether we could be deemed to be causing, contributing to or be directly linked to these risks.

¹ Tier 2 suppliers engaged by Uniting Communities Tier 1 suppliers to assist them in providing goods/services to Uniting Communities. Tier 3 suppliers are the suppliers engaged by Uniting Communities Tier 2 suppliers.

Industry	Risk to Uniting Communities
Linen and Cotton	<p>Linen and cotton production carry heightened risks for modern slavery. As an entity that operates in the aged care sector, we rely heavily on these products for sheets and towels for our beds, bathrooms and kitchens.</p> <p>Recently, linen and cotton have carried a heightened modern slavery risk, particularly from Bangladesh and China's Xinjiang Uyghur Forced Labour Region ("Xinjiang")</p> <p>Risk to Uniting Communities: Directly-Linked</p>
Food and consumables	<p>Certain food and consumables carry heightened modern slavery risks, e.g. tomatoes coming out of Xinjiang have been identified as a high-risk commodity and broader food supply chains for fish and cocoa carry heightened modern slavery risks.</p> <p>Risk to Uniting Communities: Directly-Linked</p>
Personal Protective Equipment (PPE)	<p>There has been extensive media coverage regarding modern slavery in Malaysia with the production of single use gloves.</p> <p>Whilst PPE supply chains have always carried heightened modern slavery risks, the COVID-19 pandemic increased the modern slavery risks of these supply chains with increased demand and heightened pressure on these supply chains.</p> <p>Risk to Uniting Communities: Directly-Linked</p>
Cleaning	<p>The cleaning industry is a high risk industry for modern slavery because of the prevalence of migrant workers and unskilled labour who are more vulnerable to falling into modern slavery conditions.</p> <p>Furthermore, there is an increased prevalence of practices such as deceptive recruitment and debt bondage in the industry. An additional risk factor arises because of sub-contracting practices which result in reduced visibility and control over the practices of cleaning suppliers.</p> <p>Risk to Uniting Communities: Directly Linked</p>
Solar panels (and the raw material polysilicon)	<p>Solar panels and the raw material within solar panels called polysilicon are high risk goods and raw materials for modern slavery risk. Many solar panels are made in, or contain raw materials from, the Xinjiang Uyghur Autonomous Region in China which is a high risk jurisdiction because of known forced labour practices.</p>
Construction	<p>Particular raw materials used in the construction industry (for example, bricks) carry heightened modern slavery risks. Furthermore, prevalent risk factors include labour exploitation and dangerous working conditions which are often present deeper in construction supply chains (i.e., beyond Tier 1 suppliers).</p>

Operational risks

Uniting Communities has assessed that the risk of modern slavery occurring in its operations is low.

The majority of our expenditure (approx. 70%) is spent employing our own staff who deliver personal (i.e. human to human) services. Most of our people are employed under one of six Enterprise Agreements that are approved by the Fair Work Commission of Australia. There is minimal risk of Modern Slavery in this area of expenditure due to the governance mechanisms in place through the Australian employment legislative framework.

Appointing suppliers is an inherent operational risk. Where tender processes are used, Environmental, Social and Governance (ESG) aspects form part of the criteria on which assessments are made and are incorporated as part of the contractual terms and conditions. Where more simple purchasing decisions are being made, the use of our Sustainable Procurement Checklist is utilised and incorporates ESG criteria.

Uniting Communities operates across a number of service sectors and related standards and has an established organisational 12-month audit program that monitors a range of risk and compliance exposures, assessing and reporting against these standards:

- Food Standards Australia New Zealand
- Aged Care Quality Standards
- Australian Service Excellence Standards
- NDIS Practice Standards
- Lifeline Australia Volunteer Standards
- Headspace Model Integrity Framework
- National Standards for Mental Health Services
- WHS Standards for Self-Insured Employers
- Injury Management Standards for Self-Insured Employers

A regularly audited Quality Management Framework incorporates all the standards above, in addition to Staff Code of Conduct; Staff Hazard and Incident Reporting; Compliment, Complaint and Concern procedure; and a Whistleblowers policy, which can be used by staff to report eligible disclosures which includes instances of Modern Slavery so it can follow an internal procedure to be resolved.

In addition to the availability of the above policies and procedures, Uniting Communities has a robust training framework, which in this reporting period was expanded to include modern slavery training. This is outlined further in Criteria 4.

Uniting Communities acknowledges the inherent modern slavery risks associated with the use of labour hire, which is used to fill staff shortages. Uniting Communities will continue to monitor the labour hire supplies that it engages.

4. Actions taken to assess and address risks, including due diligence and remediation processes

Staff information

Modern Slavery Training

A staff training package focused on identifying risk indicators for Modern Slavery was developed and launched in FY25. While mandatory for managers, all staff are encouraged to complete the training. This will continue to be monitored and tracked for completion and compliance in the next reporting period.

Broader Staff Awareness

Uniting Communities includes reference to Modern Slavery within the Staff Code of Conduct and continues to develop an intranet repository of easily accessible information to assist staff to understand how to identify operational or supplier related modern slavery risks. This repository is available to be used as a training tool by managers and includes:

- Definitions and examples of different types of Modern Slavery.
- The internal reporting framework, i.e. hazard and incident reporting; compliment, complaint and concern procedures, and a whistleblowers policy.
- Alternative external contacts that can be used to report instances of suspected Modern Slavery.

Third-party advisors and use of Modern Slavery portal

During this reporting period, our engagement of third party advisors continued to assist us in developing our modern slavery compliance framework. They facilitate our identified risk and due diligence framework, and assist us in implementing modern slavery actions and evaluating these actions to develop plans for each reporting period.

Through our third-party advisors, in the reporting period we continued our use of an electronic Modern Slavery Portal (“Portal”), allowing us to undertake due diligence on our suppliers and keep track of the suppliers’ risk profile over time.

The Portal is interactive and automates aspects of our due diligence by automatically assessing suppliers against our risk matrix (described further in Criteria 3 above) and updating the suppliers risk score when further due diligence is undertaken. The supplier data is collated and presented on an interactive dashboard which allows us to evaluate suppliers and track their risk and remediation tasks (where required).

Additionally, the Portal has the following functionalities that will be used in our supplier due diligence processes:

- Automatic issuing of questionnaires to suppliers who meet a due diligence threshold.
- Correspondence directly with our suppliers via the Portal – e.g. to address non-compliances identified in our due diligence processes, we can liaise with our suppliers via the Portal requiring remediation efforts.
- Consolidation of our supplier’s risk score across multiple due diligence efforts and tracking of changes to this risk score overtime.
- Issuing of modern slavery training to suppliers and tracking completions of this modern slavery training.
- Automatic reporting and auditing functionalities – e.g. reports can be produced to indicate which suppliers have been issued with questionnaires and which questionnaires have been completed.

Due diligence

Due diligence process undertaken

During this reporting period, via the Portal, due diligence processes continued on our Tier 1 suppliers.

- Risk matrixing² – 491 suppliers were matrixed and assessed against various risk factors, including jurisdictional risks, entity-based risks, industry and sector-based risks, and product and services risks.
- Risk screening – new and existing matrixed suppliers above \$5,000 p.a. spend were screened. Our third-party advisors utilise a risk and compliance screening tool which screens suppliers for risks in broader environmental, social and governance risks such as:
 - Integrity risks – bribery, corruption and/or fraud risks.
 - Environmental, Social and Governance Risks – modern slavery and environmental risks.
 - Data and cyber risks.
 - Operational and quality risks.
 - Identity risks – e.g. transparency risks.
 - Financial risks.
- Self-assessment questionnaires issued to 34 suppliers based broadly on a risk threshold of an annual spend of > \$10,000 and a risk rating of moderate or high risk. 11 were returned with no Modern Slavery instances identified. Follow up continues with the remainder of the suppliers who have not answered the self-assessment questionnaire.

² Existing and new suppliers with an annual spend of \$5,000 or more were risk matrixed and risk screened during this reporting period.

Due diligence case studies

Case studies outlining two (2) examples of how due diligence has assisted Uniting Communities in assessing and addressing modern slavery risks are outlined below.

Case Study 1

During the reporting period, we issued a self-assessment questionnaire to a supplier who is an electrical maintenance supplier.

The supplier answered that they require employees to lodge deposits of money or identity documents as a condition of employment. Requiring the lodgement of money or documents is a risk indicator for modern slavery given the prevalence of these practices within instances of forced labour.

This answer was marked as “high risk” in the Portal and Uniting Communities conducted further due diligence with the supplier to ascertain more information about their answer. Through ongoing correspondence with the supplier, Uniting Communities was able to confirm that the supplier answered this question incorrectly.

Case Study 2

We also issued a self-assessment questionnaire to a supplier who provides us with cleaning supplies during the reporting period.

The supplier answered that they are state owned. An organisation being foreign state-owned is a risk indicator for modern slavery particularly in high-risk jurisdictions where there are Government sanctioned practices such as forced labour.

Uniting Communities undertook further due diligence on the supplier who confirmed that they answered this question in error and that they are in fact privately owned.

5. How do we assess effectiveness of actions being taken to assess and address modern slavery risks

This reporting period was dedicated to expanding our due diligence processes by issuing self-assessment questionnaires to 34 suppliers.

At the beginning of this reporting period, we established an action plan which outlined action items to “continuously improve” our modern slavery compliance framework throughout the reporting period.

Some of the key actions taken in this reporting period were considered successful:

- Increased Modern Slavery information available to staff and making a training package available for staff and managers.
- Continued development with our third-party adviser and utilising the portal to better understand our supplier base.
- Continued our due diligence process on Tier 1 suppliers, including issuing 34 suppliers with self-assessment questionnaires.

No Modern Slavery instances were reported through internal avenues, i.e. through our Complaints/Compliments/Feedback procedure or Whistleblowers procedure or otherwise identified through due diligence.

Based on progress made during this reporting period, we have developed an action plan with our third-party advisors to continue to progress actions throughout the FY26 reporting period. This has been developed through reviewing the progress made during the reporting period and identifying actions that assist us in:

- Continuing to progress our modern slavery compliance framework; and
- Filling key gaps in our oversight of our supply chains and our understanding of our supply chain risks.

Some examples of the action items that we are planning to undertake during the reporting period are outlined in Criteria 7 below.

6. Consultation

This modern slavery statement is submitted by Uniting Communities. The included entities reported on in this modern slavery statement are the subsidiaries outlined in Criteria 1.

The governing Board of Uniting Communities also governs its subsidiary Erwin Vogt Foundation (as outlined in Criteria 1). In terms of the day-to-day management, the Executive of Uniting Communities have oversight and control of the day-to-day activities of Uniting Communities and its subsidiaries. There has been increasing engagement with the Executive and Uniting Communities' modern slavery compliance, with the development of mandatory modern slavery training for the Executive during this reporting period. As this training is completed by the Executive during the FY26 reporting period, the Executive will have an increased understanding of the requirements of the Act and what Uniting Communities is doing in this space.

With Uniting Communities' uniform approach to its governance and modern slavery compliance framework, we consider consultation between Uniting Communities and the subsidiaries to be extensive.

Board approval

This is Uniting Communities' modern slavery statement for the reporting period 1 July 2024 to 30 June 2025.

Approved by the Uniting Communities Incorporated Board on 30 October 2025.



Nigel Hall

Board Chair
Uniting Communities Incorporated

7. Further information

Action plan for the period ending 30 June 2026

As outlined in Criteria 5, Uniting Communities has developed an action plan to guide the actions undertaken during FY26. Some examples of the actions we have set out in next year's action plan are as follows:

- Expand the supplier base that are issued with self-assessment questionnaires, including following up with suppliers that have not answered the self-assessment questionnaires during this reporting period
- Continue to investigate how the Portal could better fit into a workflow process.
- Monitor the uptake of Modern Slavery staff training package.
- Explore how Uniting Communities can begin to conduct due diligence on its Tier 2 suppliers.

Continued monitoring to ensure compliance

The Attorney General's department has begun consultation to discuss the proposed amendments to the Act. Uniting Communities will monitor the progress of this consultation and any amendments made to the Act to ensure that its modern slavery compliance framework is complaint with any changes implemented.

