

Modern Slavery Statement

Reporting Period 1 July 2024 - 30 June 2025




newhorizons
wellbeing. done well.

A Message from the Leadership of New Horizons

At New Horizons, our commitment to human rights is not just a policy—it's a lived value that guides every decision we make. In 2025, we reaffirm our dedication to combatting modern slavery in all its forms, recognising that exploitation can occur in complex and hidden ways across global and local supply chains.

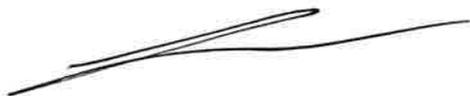
We continue to act with integrity, transparency, and purpose—ensuring that our business practices reflect the dignity and safety of those we serve, employ, and partner with. During this Reporting Period, we are proud to report that the assessed risk of modern slavery within our operations and supply chain remains low. This reflects the strength of our governance, the maturity of our Modern Slavery Framework, and the vigilance of our people.

We know that risk is never static. That's why we've deepened our approach—enhancing supplier due diligence, embedding modern slavery risk into our enterprise assurance processes, and aligning our practices with the evolving expectations of regulators, communities, and the Anti-Slavery Commissioner.

For over 55 years, New Horizons has stood for inclusion, empowerment, and ethical leadership. As we continue to grow, we remain focused on delivering essential services where others cannot, while ensuring that our impact is always values-led and socially responsible.

To our staff, partners, and peers—thank you. Your commitment, compassion, and courage are the foundation of our progress. Together, we will continue to uphold human rights, challenge injustice, and contribute to a future free from modern slavery.

Luke Buckley
Chief Executive Officer



27 October 2025

Peter Howell
Chair of the Board



27 October 2025

1. Overview

The Modern Slavery Act 2018 (Cth) requires entities with consolidated annual revenue exceeding \$100 million to submit an annual Modern Slavery Statement. This document represents New Horizons Enterprises Limited's fifth Statement, covering the Reporting Period from 1 July 2024 to 30 June 2025.

We acknowledge that individuals working within our supply chains—particularly those in outsourced, offshore, or subcontracted arrangements—may be vulnerable to exploitation, coercion, or abuse. These risks can have devastating impacts on individuals, families, and communities. We do not tolerate any form of modern slavery, including forced labour, human trafficking, debt bondage, deceptive recruitment, child labour, or practices that deprive people of their freedom, dignity, or safety.

New Horizons remains committed to upholding the human rights of our workforce, clients, and broader community. We act with integrity and transparency to prevent modern slavery across our operations and supply chains. This Statement outlines our continued efforts to identify, assess, and mitigate modern slavery risks, including:

- Strengthening supplier engagement and due diligence
- Embedding risk governance into our enterprise assurance framework
- Collaborating with partners who share our ethical values and commitment to human rights

While we believe our direct exposure to modern slavery risks during the Reporting Period was minimal, we remain focused on continuous improvement. Our approach is guided by the United Nations Guiding Principles on Business and Human Rights and reflects our commitment to ethical leadership, transparency, and proactive risk management.

2. Structure Operations and Supply Chain

Who are we?

New Horizons Enterprises Limited (ACN 002 066 604) is the reporting entity for this Modern Slavery Statement, submitted in accordance with the Modern Slavery Act 2018 (Cth) for the Reporting Period 1 July 2024 to 30 June 2025.

New Horizons is an Australian public company limited by guarantee. We operate as a standalone entity and do not control any other entities.

For over 55 years, New Horizons has been dedicated to improving the rights, wellbeing, and inclusion of thousands of vulnerable and disadvantaged individuals. We specialise in delivering disability support, mental health services, aged care, and psychosocial programs that empower people to live independently and with dignity.

Our vision is for happy, inclusive communities where collaboration creates opportunity and improves quality of life. This vision is realised through a diverse portfolio of programs and services designed to meet the evolving needs of our customers and communities.

Operations

New Horizons' Head Office is located at 15 Twin Road, North Ryde, NSW 2113, with additional offices and service hubs throughout New South Wales. Our operations remained stable during the Reporting Period, with continued service delivery across NSW and Queensland.

We directly employ staff in Australia and maintain robust governance, risk, and assurance frameworks to support ethical and transparent operations.

- **Direct Employment**

As at 30 June 2025, New Horizons employed 1,114 staff across our services.

- **Service Delivery**

During the Reporting Period, we continued to provide advice, support, and connection through a comprehensive range of services, including:

- Disability and mental health support
- Aged care and psychosocial recovery programs
- Housing and homelessness services
- Youth and family support

- **Associated Brands and Enterprises**

In addition to our core wellbeing services, we operate several complementary businesses and initiatives:

- **Wellbees** – a sustainable bee frame enterprise
- **Packable** – a social enterprise offering packing solutions
- **i.am** – a psychosocial support program for young people
- **headspace** – a free and confidential mental health service for youth aged 12–25 and their families

Our customers include people living with disability, mental health concerns, older Australians, young people, individuals at risk of homelessness, and Aboriginal and Torres Strait Islander communities.

Growth of the Barista Brunch Bar

New Horizons launched a vibrant social enterprise initiative known as the *Barista Brunch Bar* (BBB)—a mobile café located at our Head Office in North Ryde, NSW. Operated in partnership with Double Roasters, BBB offers high-quality coffee, breakfast and brunch meals, snacks, and event catering services.

BBB was created to foster community connection, inclusion, and wellbeing—serving as a welcoming space for staff, clients, and visitors. The initiative reflects our commitment to social impact and ethical enterprise.

All profits generated by BBB are reinvested into New Horizons to support our community-based services, in line with our charitable purpose as a not-for-profit organisation.

Aged Care Facility

While our residential aged care facility at 53–63 Badajoz Road, North Ryde, NSW was closed in April 2023, New Horizons continues to deliver a range of aged care supports. These include:

- Independent living assistance
- Inclusion and wellbeing programs
- Access to medical and specialist services

Our aged care services remain aligned with our mission to support older Australians to live safely, independently, and with dignity.

Supply Chain

New Horizons procured goods and services from over **520 suppliers** during the Reporting Period. The geographic composition of our supplier base remained consistent with previous years, with **99% of suppliers based in Australia**.

Suppliers are categorised into:

- **Trade Suppliers** – those directly supporting service delivery (e.g. clinical equipment, food services, transport)
- **Non-Trade Suppliers** – those supporting corporate and operational functions (e.g. IT, HR, legal, property)

Only **1% of suppliers** were located overseas, primarily supporting IT and HR functions. Two of our top 20 suppliers by spend were headquartered in the United States, providing enterprise software and digital workforce solutions.

We continue to assess supplier risk profiles and engage with vendors who align with our ethical sourcing standards and modern slavery commitments.

3. Our modern slavery risks

During the 2025 Reporting Period, New Horizons continued its assessment of modern slavery risks across our operations and supply chains to identify where we may be, directly or indirectly, linked to modern slavery practices. Our assessment indicates that the overall risk of modern slavery within our operations and direct supply chain remains low, based on the following factors:

- a.** The vast majority of our direct suppliers (approximately 99%) are based in Australia and are subject to robust labour laws, industrial relations frameworks, and modern slavery legislation.
- b.** Our limited number of overseas suppliers operate in jurisdictions with strong legal protections against modern slavery, including Canada, the United Kingdom, and the United States, which maintain mandatory reporting regimes and enforcement mechanisms.
- c.** The nature of goods and services procured—primarily professional services, health and wellbeing products, and community support resources—are generally considered low risk for modern slavery exposure.
- d.** The sectors in which New Horizons operates—charity, health, and community wellbeing—continue to be assessed as low risk for modern slavery, due to their regulatory oversight and ethical procurement standards.

We recognise, however, that no organisation is immune to the risks of modern slavery. As a large not-for-profit with finite resources, our capacity to investigate risks beyond our first-tier suppliers remains constrained. Nonetheless, we remain vigilant to the possibility of indirect links to modern slavery practices deeper within our supply chain, particularly in second and third-tier relationships.

Geographic Risk Level: Low

Our geographic risk profile remains low. In 2025, 99% of our suppliers continued to be based in Australia, a jurisdiction with strong protections for workers and comprehensive modern slavery legislation. All overseas suppliers engaged during the Reporting Period were located in countries with low prevalence of modern slavery, as assessed against the latest Global Slavery Index. These countries—Canada, the United Kingdom, and the United

States—are recognised for their legal frameworks, transparency obligations, and enforcement of human rights standards. New Horizons does not directly procure goods or services from countries identified as high-risk for modern slavery.

We acknowledge, however, that limited visibility into second and third-tier suppliers—particularly in global supply chains—may present residual risks. We remain committed to improving transparency and due diligence practices to better understand and mitigate these risks over time.

Given the nature of New Horizons as a large charity with limited resources, the ability to examine our risks beyond our first-tier suppliers remains a challenge in identifying modern slavery risk further 'down-stream', within our second and third tier supply chains. Despite this, we are cognisant that we may be indirectly linked to modern slavery practices further down our supply chain as described below.

Geographic risk level: Low

We have assessed the geographic risk associated with modern slavery practices to be low during the Reporting Period given that 99% of our suppliers were based in Australia. All our overseas suppliers are located in developed countries where there is a strong rule of law and protection of human rights, with countries such as Canada, United Kingdom and the United States of America also imposing reporting obligations in relation to Modern Slavery.

We have reviewed the location of our overseas suppliers against the Global Slavery Index and highlight that all the overseas suppliers engaged by New Horizons are based on countries that are considered to be at lower risk of modern slavery.

New Horizons does not directly procure goods or services from suppliers based in countries where there is a prevalence of modern slavery as shown in the graphic below. New Horizons understands that the lack of visibility in certain overseas markets carries additional risks of modern slavery especially in second and third tier levels of our chain.

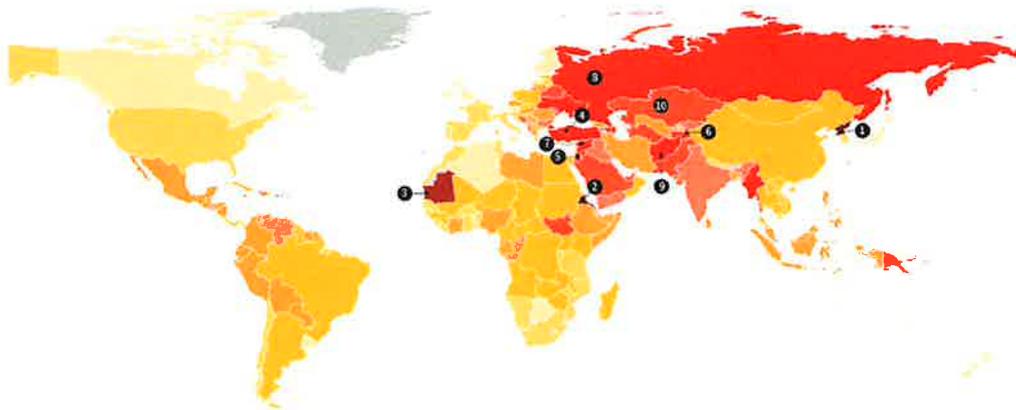


Figure 5
Estimated prevalence of modern slavery by country
 (noting estimated prevalence per 1,000 population for the 10 countries with highest prevalence)



Rank	Country	Prevalence
1	North Korea	104.6
2	Eritrea	90.3
3	Mauritania	32.0
4	Saudi Arabia	21.3
5	Türkiye	15.6
6	Tajikistan	14.0
7	United Arab Emirates	13.4
8	Russia	13.0
9	Afghanistan	13.0
10	Kuwait	13.0

(Global Slavery Index, <https://www.walkfree.org/global-slavery-index/rmap/>)

Sector and Industry Risk Level: Low

New Horizons operates within the Not-For-Profit sector, delivering services across a range of highly regulated domains including healthcare, disability, aged care, youth support, housing, and property. These sectors are subject to rigorous oversight under Australian legislation, which enhances transparency and accountability across procurement practices. As a result, we have assessed our sector and industry risk level as remaining low during the 2025 Reporting Period.

Nevertheless, we acknowledge that modern slavery risks may arise beyond our immediate operations, particularly within second and third-tier supplier relationships. These risks are most likely to emerge where suppliers:

- Operate in the **technology manufacturing sector**, which may involve vulnerable populations in mineral extraction and the assembly of electronic components—activities often linked to exploitative labour practices in global supply chains.
- Operate in the **cleaning and maintenance sector**, which frequently engages workers from migrant backgrounds, including individuals with limited English proficiency and precarious visa arrangements, who may be at heightened risk of exploitation.

Product and Services Risk: Low

New Horizons predominantly engages non-trade suppliers to deliver essential services such as cleaning, electricity, technology, and general office and property maintenance. While these services are considered low risk in terms of direct exposure to modern slavery, we remain alert to the vulnerabilities associated with subcontracted labour.

We recognise that contractors engaged by our suppliers may include individuals from culturally and linguistically diverse backgrounds, some of whom may hold temporary work or immigration visas. These factors can increase susceptibility to exploitative practices. Accordingly, while our overall product and services risk remains low, we continue to monitor and address these potential exposures through our procurement and contract management processes.

Supply Chain Model Risk: Low

New Horizons maintained a large and diverse supply chain during the 2025 Reporting Period, engaging over 500 suppliers. Based on available information, our supply chain model risk remains low. However, we acknowledge that the scale and complexity of our supplier network—combined with limited visibility beyond first-tier relationships—presents challenges in identifying and mitigating modern slavery risks further downstream.

We remain committed to strengthening our due diligence processes and supplier engagement strategies to better understand and manage these risks. Further detail on our mitigation efforts is provided in Section 4 of this Statement.

4. Our action

Due Diligence

New Horizons remains steadfast in its commitment to preventing and addressing modern slavery risks within our operations and supply chains. We recognise that due diligence is not a one-off activity but a continuous process requiring vigilance, collaboration, and improvement.

Given the complexity of global supply chains, tracing supplier practices beyond first-tier relationships remains a challenge. To mitigate this, New Horizons conducts due diligence prior to entering new supplier agreements and continues to strengthen its internal processes to identify and respond to potential risks.

Key Due Diligence Measures

Throughout the 2025 Reporting Period, we maintained and enhanced our established due diligence procedures, which include:

Modern Slavery Statement Disclosure

Suppliers subject to the Modern Slavery Act 2018 (Cth) are required to provide their annual modern slavery statement. This enables New Horizons to assess their awareness, risk profile, and mitigation strategies.

Standard Terms and Conditions

For suppliers not required to report under the Act, our Standard Terms and Conditions mandate that they must not engage in modern slavery and must notify New Horizons within 30 days of any known or suspected instances within their operations or supply chains.

Ethical Tendering Practices

Our procurement process prioritises ethical and transparent engagement. Using a paired comparison method, suppliers are evaluated across multiple criteria—not solely price—to ensure alignment with our values and responsible sourcing principles.

Supplier Agreements

All new suppliers are required to sign our Supplier Agreement, which includes specific clauses on modern slavery. Suppliers must confirm they are not aware of any modern slavery in their operations or supply chains and commit to taking reasonable steps to prevent its occurrence.

Subcontractor Statements

We continue to require subcontractors to complete a statement confirming compliance with Australian employment legislation, including the payment of superannuation entitlements.

Combatting Modern Slavery Policy

Our internal policy outlines New Horizons' strategic approach to identifying, managing, and mitigating modern slavery risks. It remains a cornerstone of our governance framework.

Supplier Code of Conduct

Now firmly embedded, our Supplier Code of Conduct sets clear expectations that suppliers:

- Comply with all applicable laws and industry standards;
- Cooperate in providing modern slavery-related information;
- Offer transparent disclosures about their operations and supply chains;
- Maintain anonymous, non-retaliatory reporting channels for workers; and
Promptly address any breaches of the Code.

We continue to refine our systems for monitoring and managing modern slavery risks, recognising that this is an evolving area of practice. In the next reporting period, we plan to expand our efforts by:

- Delivering targeted training and education on modern slavery to all staff;
- Requiring all new suppliers to complete a modern slavery questionnaire prior to engagement (see Section 7 for further detail).

Grievance and Remediation

New Horizons acknowledges that our influence over larger suppliers may be limited due to the scale of our operations. Nonetheless, we remain committed to working collaboratively with suppliers to address adverse impacts and prevent recurrence.

There were no material changes to our grievance and remediation mechanisms during the Reporting Period. However, we continue to recognise this as a critical area for development, particularly in supporting individuals who may be affected by modern slavery or broader human rights violations.

Our **Integrity Hotline** remained active and accessible to all current and former employees, volunteers, contractors, suppliers, and their family members. This confidential and anonymous service allows individuals to report unethical or unlawful conduct, including suspected modern slavery.

During the 2025 Reporting Period, no reports of modern slavery were received via the Integrity Hotline. We encourage all stakeholders to use this service with confidence, knowing that all reports are treated seriously, investigated thoroughly, and handled with discretion.

We are diligently working on establishing and refining systems to monitor and manage the risks associated with modern slavery in our operations and supply chain, recognizing that this initiative is in its formative phase and is a continuous endeavour.

As part of our efforts to improve transparency of our operations and supply chain in the upcoming reporting period, we are planning to provide training and education on modern slavery to all our staff and require all new suppliers to complete a modern slavery questionnaire before engagement, as explainer further in section 7 of this Modern Slavery Statement.

5. Assessing the effectiveness of our action

During the 2025 Reporting Period, New Horizons maintained its commitment to evaluating the effectiveness of our actions to combat modern slavery. While our monitoring and reporting mechanisms remained largely consistent with the previous year, our strategic focus shifted toward deepening our understanding of modern slavery risks—particularly how they may manifest within our expanding operations and supply chains.

This emphasis was reflected in our enhanced due diligence activities, supplier engagement practices, and planning for future capability-building initiatives. We recognise that assessing effectiveness is a critical component of a mature modern slavery framework and that this area requires ongoing investment as our organisation grows and diversifies.

As we engage new suppliers across broader geographic and sectoral boundaries, we are increasingly aware of the evolving nature of modern slavery risks. Accordingly, we are working to strengthen our internal systems to better measure the impact of our actions and identify areas for improvement.

New Horizons remains committed to the due diligence principles outlined in the United Nations Guiding Principles on Business and Human Rights. In line with these principles, we are progressing toward the development of an effectiveness framework that incorporates both:

- **Quantitative indicators**—such as the number of suppliers assessed, disclosures received, and training sessions delivered; and
- **Qualitative insights**—including supplier feedback, case studies, and internal stakeholder reflections on risk awareness and mitigation.

This dual approach will enable us to more accurately evaluate the reach and impact of our initiatives, inform future decision-making, and ensure our modern slavery response remains fit for purpose.

6. Process of consultation

Consultation was not necessary in the preparation of our Modern Slavery Statement for this Reporting Period as New Horizons is a standalone entity.

7. Any other relevant information

New Horizons remains deeply committed to strengthening our due diligence, grievance, and remediation processes, as well as the tools we use to evaluate the impact of our modern slavery response. This commitment is part of an ongoing journey—one that requires persistence, adaptability, and collaboration.

As a not-for-profit organisation operating within resource constraints, we continue to face challenges in allocating dedicated funding and capacity to modern slavery initiatives. Nonetheless, we remain resolute in our efforts to address modern slavery risks to the fullest extent possible, guided by our values and our duty of care to those impacted by our operations and supply chains.

Key areas of action for the next reporting period

Our strategic priorities for the upcoming reporting period build on the initiatives established in 2025 and reflect our commitment to continuous improvement. These focus areas will help strengthen our ability to identify, assess, and respond to modern slavery risks across our supply chain and operations:

- **Enhancing supplier onboarding protocols**, including the rollout of a modern slavery questionnaire for all new suppliers;
- **Delivering targeted training and awareness programs** for staff to build internal capability and understanding of modern slavery risks;
- **Improving data collection and reporting mechanisms** to support more robust evaluation of our actions and their effectiveness;
- **Strengthening grievance and remediation pathways**, with a focus on accessibility, responsiveness, and alignment with human rights principles;
- **Deepening engagement with existing suppliers**, particularly those in higher-risk sectors, to promote transparency and shared accountability.

These initiatives reflect our proactive stance and our belief that meaningful change is possible—even within the constraints of a charitable operating model. We will continue to refine our approach in line with emerging best practice, stakeholder expectations, and the

evolving regulatory landscape.

Statement from New Horizons' Board Chair



This Modern Slavery Statement for the Reporting Period 2024 - 2025 was approved by the Board of New Horizons Enterprises Limited (ACN 002 066 604).

A handwritten signature in black ink, followed by the date "27/10/2025" written in a similar cursive style.

Signed:

Peter Howell
Chair of the Board



For queries relating to this statement:

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