



modern slavery statement

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Aruma's commitment to combating Modern Slavery

As a member of the G20 group, Australia has taken significant steps to address modern slavery within its corporate supply chains. As one of Australia's largest not-for-profit disability service providers, Aruma is committed to continually improving our practices to contribute to the eradication of modern slavery.

In 2018, Australia passed the Modern Slavery Act that requires companies to report on their actions to combat modern slavery. Aruma works to the highest professional and ethical standards to promote a culture of responsibility and reinforce our commitment to zero tolerance against harm, including slavery and human trafficking. Aruma complies with all laws, regulations, and standards, and we expect the same from our suppliers, contractors, employees, and business partners.

Consistent with our well-established values, we stand firmly against all forms of abuse, neglect and exploitation and encourage people to speak up and take all required measures to detect and prevent modern slavery and other human rights abuses in our businesses and supply chains.

At Aruma we recognise that the global issue of modern slavery is interconnected with other global issues such as climate change, gender inequality, racial injustice, and poverty. There are also intersections between modern slavery and disability, as people with disability may have higher risks of exploitation and have less opportunities for reporting or escaping from these situations. Efforts to combat modern slavery should focus on improving access, promoting inclusivity, and combating discrimination. At Aruma, we are committed to holistically addressing modern slavery, working towards a just and sustainable workforce and supply chain, where all individuals are afforded their human rights and dignity. This includes embedding the eradication of modern slavery into awareness programmes, enforcement of legislation, complaints procedures, promoting fair work practices and creating economic opportunities.



At Aruma, we recognise modern slavery in Australia and around the world today and understand that modern slavery practices include:

- Recruitment, harbouring and movement of persons for exploitation, known as **trafficking in persons**;
- Situations where victims are owned as a commodity, as an object for purchase and where their labour is forced in an unrestricted way, known as **slavery**;
- Where victims have their personal freedom significantly restricted and are not free to stop working or leave their place of work, recognised as **servitude** or **forced labour**;
- Cases where coercion, threats or deception are used to make victims marry, or where they do not understand the nature and effect of the marriage ceremony, recognised as **forced marriage**;
- Where victims' services are pledged as security for a debt that is manifestly excessive or the length or nature of the services is unlimited and undefined, known as **debt bondage**;
- Where victims are deceived about whether they will be exploited through a type of modern slavery, known as **deceptive recruiting for labour or service**; and
- Cases of **worst forms of child labour**, where children are exploited through slavery or similar practices, including for sexual exploitation, engaged in hazardous work which may harm their health, safety or morals, or used to produce or traffic drugs.

This statement is made in compliance with the *Modern Slavery Act 2018* and sets out the steps Aruma has taken in FY23 to ensure that slavery and trafficking is not taking place in our organisation or supply chain and the steps we will make in FY24 in continue to combat Modern Slavery:

- Identify and describe risks of modern slavery practices in our operations and supply chains and any entities we own or control;
- Assess and address risks of modern slavery practices, including due diligence and remediation processes, in our operation and any entities that we own or control;
- Assess the effectiveness of actions we take to assess and address modern slavery risks; and
- Consult with any entities we own or control.

Message from our CEO

I am pleased to present Aruma's Modern Slavery Statement for FY23. As the CEO I affirm my commitment and the commitment of the Board and senior leadership team to combat acts of modern slavery through our robust governance framework, our values, and our focus on upholding human rights and putting participants first.

Addressing modern slavery is a fundamental aspect of achieving social justice for all individuals, regardless of their background or circumstances. Aruma believes that people with a disability have the right to live a great life, the life they want, the life they choose. This is at the heart of our service provision.

This year our focus has been on building our capability to identify and assess modern slavery through the development of our Modern Slavery awareness training program and deepening our understanding of our supply chains to make meaningful change. We remain proud of the steps we are taking to contribute to the eradication of Modern Slavery.

Aruma's modern slavery statement outlines our efforts, as a leading disability service provider to fulfil our corporate responsibility through our commitment to protecting and promoting human rights in our operations, businesses, and supply chain. We have a responsibility to continuously seek new ways to advocate for the rights of vulnerable and marginalised groups and improve and refine our processes to actively contribute to the eradication of modern slavery.



**Martin Laverty,
Aruma's CEO**

Message from our Human Rights Lead

Organisations play a significant role in the global economy and have a responsibility to ensure that human rights are upheld in their operations. By providing a Modern Slavery Statement, organisations, including Aruma publicly acknowledge this responsibility and demonstrate their commitment to human rights.

Modern Slavery Statements are not just about compliance with legal requirements; they embody a broader commitment to human rights and ethical business practices. They represent a tangible step that businesses can take to align their operations with internationally recognised human rights standards and play their part in eradicating modern forms of slavery.

**Judy Topper,
Aruma's Human Rights Lead**



who we are

Aruma is a for-purpose disability service provider supporting individuals to live, learn and work as they choose.

Aruma is one of the largest disability service providers and a trusted partner for around 5,000 people with disabilities throughout the east coast of Australia.

In 1962 Lionel Watts and his wife Dorothy founded House with No Steps, his ideas and determination have changed the world of disability forever. Another strong vocal advocate for people experiencing disadvantage was Edmond William (Bill) Tipping, in 1970 the EW Tipping Foundation was established to support people with disability. In March 2018, House with No Steps and The Tipping Foundation came together to shape the future with the same determination as our Founders. In July 2019, this passion and commitment united under a new name – Aruma.

Aruma is what we make it. Aruma raises the bar higher. Aruma is a human rights warrior. Aruma is bold. Aruma is brave.



Our Purpose

Our Purpose is why we exist. It's what brings us joy and what will keep us going both now and into the future.

Supporting people with a disability to live a great life, the life they want, the life they choose.

Our Values



bold
we
speak
up



respectful
we respect
each other



authentic
we do what
we say

value
teamwork
we do things
together



excellent
we do
things
well



Our structure, operations and supply chains

Aruma structure

Aruma Services operates and controls a number of subsidiaries, which are companies limited by guarantee under Australian law:

- Aruma Services NSW Limited (ABN 96 619 337 156)
- Aruma Foundation Limited (ABN 59 032 986 751)
- Victorian Person-Centred Services Limited (ABN 64 762 103 425)
- Aruma Services Victoria Limited (ABN 86 628 265 387)

Aruma operations

Aruma has operations in New South Wales (NSW), Victoria (VIC), Queensland (QLD) and the Australian Capital Territory (ACT), the Aruma Group provides a range of services to approximately 5000 people living with disability, including:

- NDIS support co-ordination;
- Supported independent living services;
- Community support services;
- Specialist disability accommodation;
- Short term accommodation services in the form of respite care;
- Social and community participation services;
- Daily living skills services;
- Children’s services such as early childhood intervention, out-of-home care, respite, community and in home support;
- Therapy and Behaviour Support services;
- School leaver transition programs; and
- Employment Supports for approximately 500 people with a disability. The Aruma businesses across NSW, ACT and QLD include such brands as Aussie Biscuits and Summerland Farm. In addition, Aruma operate a Commercial Laundry, provides Facility Services and supplies Medical Packs and Forensic Investigation Kits, Packaging & Assembly Services, as well as Metal and Woodwork Manufacturing.

Aruma supply chains

Aruma’s supply chains support our staff in doing their work, the services we provide for our Aruma customers and the businesses we operate. We procure goods and services in the following key categories:

Key category	Principal activities	Aruma Risk Rating
Real estate	Premises our Aruma customers live in, the premises our businesses operate in, and premises our staff work in	Low
Property/facility management	Cleaning, security, property maintenance, builders, property refurbishments, furniture, and equipment.	Medium
Fleet services	Vehicle lease and maintenance	Low
Labour / recruitment agencies	External labour hire	Medium
Utilities	Electricity, gas and water	Low
Service delivery equipment / consumables	Goods and services to support our businesses (such as food ingredients, fertilisers, laundry equipment, linen, components of medical packs and forensic investigation kits)	Medium
Health and wellbeing	Personal Protective Equipment (PPE) (masks, hand sanitisers, gloves etc), children’s educational equipment	Low
Medical, health and support services	Hygiene products, medical agencies and services, medical equipment and supplies, pharmaceutical, specialised therapy and welfare services and supported living expenses for our customers	Low
ICT hardware and software	Laptops, screens, printers, cabling, software, support and network services	Medium
Marketing	Marketing and advertising and fundraising services	Low
Travel	Airline, accommodation	Low
Corporate services	Office supplies and consumables	Low
Legal services	External legal advice and guidance Australian based providers	Low
Consultancy services	External consultancy advice and guidance Australian based providers	Low

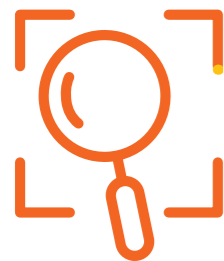
Identifying our modern slavery risks

To effectively identify risks of modern slavery practices within Aruma's operations and supply chain, we have developed robust policies and procedures that outline how Aruma will prevent, detect, and respond to modern slavery risks.

These policies cover the risks of human trafficking, slavery, forced marriage, forced labour, debt bondage, the worst forms of child labour and deceptive recruiting for labour services.

Aruma remains vigilant by ensuring supplier contracts are regularly reviewed and thorough assessments are carried out to detect any instances of exploitation or mistreatment. We aim to not just consider human rights from a compliance perspective but to be able to draw upon human rights as a powerful tool to advocate for individuals and communities.

Aruma recognises that there are risks of involvement in modern slavery across our operations and supply chain including those involved in our procurement of goods and services.



The following sections identify our modern slavery risks:

Purchaser of goods and services

Risk: There is a risk that we could purchase goods or services involved in modern slavery in their creation or provision.

Aruma: Our supply chain involves the purchase of goods and services needed for our day-to-day operations. Many of the goods and services are sourced within Australia, however some information and communications technology (ICT) services and goods for our businesses are provided from other countries. We are aware that even the goods and services sourced from Australia are likely to have a downstream supply chain touchpoint overseas.

Employer

Risk: There could be exploited labour within our workforce or supply chain.

Aruma: The percentage of agency to direct labour remain low, with an average of 5%. This does vary between line of business with community services being the lowest and employment being the highest. Aruma engages contract workers and/or third-party labour providers limiting our direct visibility and control over these workers and their employment terms.

Industry risks

Risk: Reliance on migrant, seasonal, base skilled or unskilled workers.

Aruma: Proportion of migrant and seasonal workers working in business services and support services. The main operation that uses seasonal workers is our farming and agricultural business. Support services engage with agencies that recruit and supply contract disability support workers.

Supporter of communities

Risk: There is a risk that we could support, through donations or advocacy, organisations involved in modern slavery.

Aruma: We sell products and services to a range of customers within Australia, including to those in the produce and laundry sectors. We understand Aruma could be directly linked to modern slavery through our customer relationships.

Managing modern slavery risks

Aruma's Board, CEO and Executive Leadership Team are committed to achieving the highest standards of ethical behaviour in the conduct of Aruma's operations.

We support and respect the protection of internationally proclaimed human rights for all people. They are essential to living a good life, with freedom, respect, equality, and dignity. We believe that all people have the same rights, including people with disability.

Management of our human rights risks, including modern slavery, are underpinned by our Human Rights Policy and Risk Management Framework, with oversight from the Aruma Audit & Risk Committee and Board.

Aruma manages risk through a defined process and framework. Risk management is an iterative process, in which risks are continuously identified, analysed, evaluated, treated, and monitored. These types of risk could include modern slavery.



Equipping our employees with the knowledge to remain vigilant and to report any suspected and actual lapses with compliance is fundamental in managing the risks of modern slavery.

Each Aruma employee is empowered through training, awareness and our values to raise any concerns they have within our operations, businesses and supply chain. Aruma ensures all employees have sighted and signed the Aruma Code of Conduct, this is also available to the broader public on our website.

At Aruma, we recognise that no one document, or training program can cover every conceivable situation. Our employees are required to successfully complete various e-learning and face to face training as part of their induction and engage in ongoing learning and development, including modules on whistleblowing, fairness and dignity and workplace diversity.

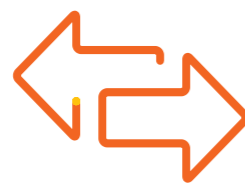
Our actions to assess and address modern slavery risks

Actions completed in FY23



Policies and Procedures

- Published and distributed organisation-wide standard agreements for use when purchasing goods or services, which include reference to modern slavery.
- Review of policies that relate to the Modern Slavery Statement.



Supply Chain

- Distributed Supplier Principles to prospective and current suppliers.
- Distributed a pre-qualification questionnaire as part of due diligence framework.



Training

- Reviewed the staff induction process for inclusion of modern slavery requirements.
- Developed an e-learning awareness training module for implementation.

Raising Concerns

Our values are evident in the way we care for the people we support, and the way our employees interact with each other within Aruma Group.

Aruma encourages our employees, suppliers, and stakeholders to speak up about any concerns regarding slavery or human rights violations in our operations, businesses or supply chain. As detailed on our website, in our supplier principles and throughout our feedback and complaints communication material, anyone can raise a concern by:

- Emailing legal@aruma.com.au
- Calling our confidential whistleblower service on 1300 790 228
- Lodging a complaint online

Aruma provides employees with access to an independent service for making disclosures of misconduct, the employee can remain anonymous, and still receive feedback and outcome notifications.

These details can be found in our Whistleblower Policy, Complaints Policy and more broadly on the intranet and website. Providing people with the knowledge of how to report misconduct and the means to anonymously report is underpinned by Aruma's values to speak up, respect others and do things well.

In addition to the reporting options provided by Aruma, our comprehensive Supplier Principles, provided to all potential and existing suppliers outlines our expectations for suppliers to provide accessible mechanisms for staff and third parties to report concerns. The supplier must also comply with any audit request and notify Aruma of any failure to comply with the Supplier Principles.

We are confident that our risk of modern slavery through our internal staff is low due to a range of policies, systems, and practices we have in operation.



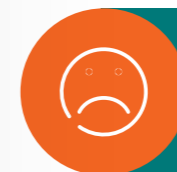
Human Resources Policies



Code of Conduct



Whistleblower policy & "Your call"



Complaints & grievances process

Assessing the ongoing effectiveness of our actions

Aruma has an established Modern Slavery Working Group which includes representatives from across different areas of Aruma.

This group collaborates to achieve the key actions, raise awareness of Modern Slavery practices within Aruma and provides updates to the Audit and Risk Committee and Human Rights Advisory Group.

Aruma understands that effectively managing the risk of modern slavery at Aruma requires a comprehensive approach that combines awareness, policies, due diligence, and ongoing monitoring. Aruma has a strong commitment to ethical and responsible practices, including a zero-tolerance for any forms of abuse, neglect, or exploitation.



Governance structure

Aruma's Board review and approve the Modern Slavery Statement for each reporting period, and subsequently monitor its implementation.

Aruma's Modern Slavery Working Group consisting of senior stakeholders from across the organisation, including Human Rights Ambassadors, and are responsible for determining and implementing Aruma's Modern Slavery Action Plan and providing updates and reports to the Audit and Risk Committee and the Board, as required.

Working with children checks and working with vulnerable people checks are completed for any staff members working in roles where these requirements are present. NDIS Worker Screening Checks are also mandatory for all Aruma disability support workers.

As part of our negotiations with unions and employees, as well as the approval process of our Enterprise Agreements (EA) with the Fair Work Commission (FWC), we will ensure that all employees receive at least the minimum award rates of pay applicable to their role. Aruma also ensures that rates of pay are adjusted each year in line with any applicable National Wage Case or Equal Remuneration Order.

By submitting our Modern Slavery Statement and publicly sharing it on our website we will help to raise awareness amongst the wider community.

Engagement and advocacy

We understand that putting an end to modern slavery demands unwavering commitment to enhancing people's lives, perfectly aligning with Aruma's core purpose.

At Aruma, we've established a dedicated team of Human Rights Ambassadors. Their mission is to relentlessly champion the absolute respect for human rights and ensure zero tolerance towards rights violations, safeguarding both our employees and customers.

The following diagram illustrates the diverse methods our Human Rights Ambassadors employ to achieve this:



Vision ahead

As a leading disability service provider, we are committed to leading by example to fulfil our corporate responsibilities through our focus on social justice and human rights in our operations, businesses and supply chain.

Aruma continues to explore avenues to identify, assess and mitigate risks, we recognise that this is an ongoing journey, and we need to continually assess the effectiveness of the steps we are taking. In the next financial year, we plan to focus on the below:

 <h3>Governance and Risk Management</h3> <ul style="list-style-type: none"> Review the modern slavery working group Terms of Reference. Monitor and react to any reforms that are implemented to strengthen the efforts to eradicate modern slavery. 	 <h3>Policies and Procedures</h3> <ul style="list-style-type: none"> Review of policies that relate to the Modern Slavery Statement. Develop an escalation and response strategy. Further communication on the whistleblowing process to increase staff awareness and encourage a speak up culture for all employees.
 <h3>Supply Chain</h3> <ul style="list-style-type: none"> Roll out an assessment / questionnaire process for all potential suppliers as part of planned improvements to procurement procedures. 	 <h3>Training</h3> <ul style="list-style-type: none"> Implement the e-learning module for modern slavery. Assess additional avenues for raising awareness.

Endorsement

Each Statement issued by Aruma during the reporting periods in the timeline will be approved by the Board and signed by the Chair of the Board.

This Statement was approved by the Aruma Board for the relevant entities in the Aruma Group on 15th December 2023 and signed by:

Candice Charles
Chair of the Board




Appendix

Australian Modern Slavery Act mandatory criteria

This Statement was prepared to meet the mandatory reporting criteria set out under the Australian Modern Slavery Act. The table below identifies where each criterion is addressed within this Statement.

Australian Modern Slavery Act mandatory criteria	Modern Slavery Statement 2022-2023	Page
Identify the reporting entity	Who we are	8
Describe the structure, operations and supply chain of the reporting entity	Our structure, operations and supply chains	12-13
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls	Identifying our modern slavery risks	14
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Our actions to assess and address modern slavery risks	18
Describe how the reporting entity assesses the effectiveness of such actions	Assessing the ongoing effectiveness of our actions	20
Describe the process of consultation with any entities that the reporting entity owns or controls	Engagement and advocacy	22
Any other information that the reporting entity considers relevant	Message from our CEO	6
	Managing modern slavery risks	16
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