



**Link  
Wentworth**  
Providing homes, building futures.

# Modern Slavery Statement

Under the *Modern Slavery Statement Act 2018 (Cth)*

Reporting Period: 1 July 2024 – 30 June 2025

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Link Wentworth Housing Limited  
ABN 62 003 084 928



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# Statutory Review and Approval

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Pursuant to the requirements of the *Modern Slavery Act 2018* (Cth), this Modern Slavery Statement:

- » Was approved by the Board of Link Wentworth Housing Limited as the principal governing body on 11 December 2025.
- » Has been reviewed, confirmed and signed as accurate by a duly authorised person, Michael Allen, PSM in their role as Chair of the Board of Link Wentworth Housing on 11 December 2025.

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Signature

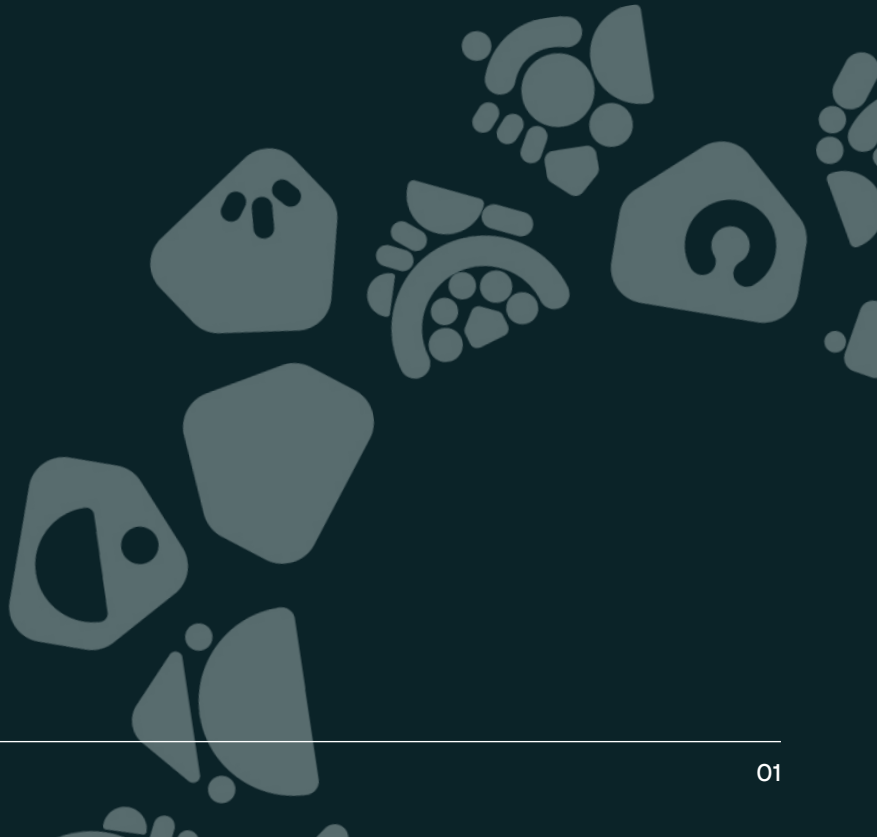
# Table of Contents

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02 Link Wentworth's Operations, Corporate Structure and Supply Chains

07 Link Wentworth's Anti-Slavery Approach – Identifying, Assessing and Addressing Risk

09 Measuring Effectiveness



## Part 1

# Operations, Corporate Structure and Supply Chains

## Operations

**Link Wentworth Housing Limited** (ABN 62 003 084 928) ("Link Wentworth", "we" and "our") is reporting entity under the *Modern Slavery Act 2018* (Cth).

Link Wentworth is:

- » Approved as a Tier 1 Not-For-Profit Community Housing Provider by the National Regulatory System for Community Housing; and
- » A registered charity with the Australian Charities and Not-for-profits Commission.

**Our core purpose is to facilitate provision of social and affordable housing solutions, and associated services to Australians facing homelessness or other forms of acute housing-related stress.**

We partner with government departments and agencies, private and institutional investors, commercial property developers and other non-government services..

The following is a brief snapshot of our key activities and achievements in the reporting period across our **community housing services**:

**6,214**

Total properties under management



**5,193** - Social housing

**484** - Affordable housing

**303** - Specialist disability accommodation

**199** - Transitional housing

**35** - Crisis accommodation

Approximately **10,000** residents living in our homes (98.4% occupancy rate)



**679** - Individuals assisted through homelessness services

**484** - Individuals helped through housing solutions

Women and children helped through Nureen service (**74**) and Ngarrunga service (**78**)

As at the end of the reporting period (30 June 2025), an additional **509** homes were in the development pipeline.

Link Wentworth also invested \$1.3 million in upgrades to residential heating and cooling systems.

In FY25, Link Wentworth puts on various initiatives for residents as part of our **charitable activities**. The following programs were held:

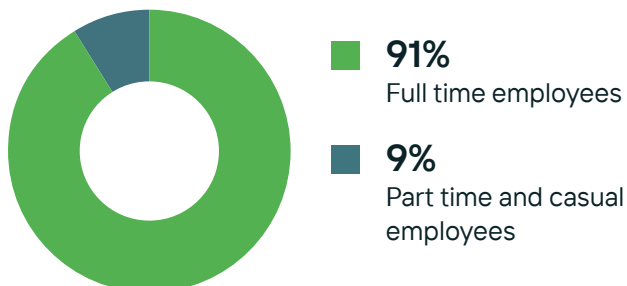
- » Education and employment referrals and workshops
- » Drop-in sessions for tenants to chat to members of our Maintenance, Tenancy and Communities teams about their home
- » Non-perishable hampers and community meals
- » Cultural and seasonable celebrations (Lunar New Year, International Women's Day, 40th Anniversary, end of year)
- » Resident competitions

**The flagship Link Wentworth Scholarship Program also provided over \$200,000 in scholarship funds to 222 residents in this reporting period.**

In FY25, Link Wentworth employed

## 220 employees

(representing a slight decrease of 6 employees from FY24). 201 of these employees were full-time, with the remainder of team members in part-time and casual positions.



Link Wentworth also engaged a small cohort of independent contractors during the reporting period, as with previous reporting periods. These contractors are engaged on an ad hoc basis where additional technical support is needed for one-off projects (for example, project management for developments and tenders). Contractors with specialist expertise are recruited through pre-existing relationships, and are well remunerated.

Link Wentworth's operations span across metropolitan and rural New South Wales, with Link Wentworth offices located in Chatswood, Katoomba, Lithgow, Penrith, West Ryde and Windsor.

## Corporate Structure

Link Wentworth Housing Limited, the primary reporting entity, is a public company limited by guarantee, with a Board of Directors as its principal governing body.

Link Wentworth Housing Limited exercises 100% control and/or owns over the following entities:

- » Link Wentworth Cammeray Ltd (ABN 57 687 121 866)
- » Link Wentworth Rouse Hill Ltd (30 687 119 704)
- » Link Wentworth Macquarie Park Ltd (34 687 119 722)
- » Link Wentworth North Manly Ltd (15 687 120 878)
- » Link Wentworth Thornleigh Ltd (79 687 122 327)
- » Link Wentworth Pennant Hills Ltd (53 687 121 848)
- » Link Wentworth Lane Cove North Ltd (83 687 122 345)
- » Link Wentworth Schofields Ltd (13 687 120 869)

None of the above controlled entities have any operational staff or conduct procurement activities. All staff and procurement activities are supplied by Link Wentworth Housing Ltd as managed services provider to each entity.

Link Wentworth acknowledges the requirement under the *Modern Slavery Act 2018* (Cth) to describe any process of consultation with owned/controlled entities. As the owned/controlled entities described in this Statement are all non-operational, do not procure goods or services, or employ staff, it is not practically possible to consult with these entities in the manner that would occur with operational entities.

## Supply Chains

In FY25, Link Wentworth engaged with **1,278 unique suppliers**

(an increase from 1,229 suppliers from FY24).

Suppliers continue to be businesses mainly operating in the following Australian industry categories:

- » Construction services
- » Utilities providers
- » Repairs and maintenance services
- » Cleaning services
- » Motor vehicle services
- » Landlords
- » Furniture suppliers
- » Storage and removal services
- » Real estate providers
- » Fundraising and marketing
- » IT, software and telephone services
- » Printing and stationery suppliers
- » Professional services
- » Insurance services
- » Financial services
- » Other employee benefits/ expenses
- » Postage and delivery services
- » Staff uniform providers

Link Wentworth's sole international supplier continues to be a real estate service provider based in the United Kingdom. All other suppliers are based in Australia.

# Link Wentworth's Anti-Slavery Approach – Identifying, Assessing and Addressing Risk

## Operations

Link Wentworth considers operational modern slavery risk to remain relatively low, because of our:

- » Exclusively Australia-based activities
- » Highly regulated and transparent government and joint-partnership development contracts
- » Employees and independent contractors being predominantly high-skilled professionals who are engaged through written contracts

## Supply Chains

Link Wentworth continues to partner with external consultants to identify and assess modern slavery in its supply chains, through the use of proprietary methodology that enables automated and comprehensive classification of Link Wentworth's procurement data. Suppliers and investments are classified and are subject to comprehensive risk profiling.

**Risk is determined by reference to the leading current estimates of modern slavery incidence at national and industry levels, and accounts for both operational and supply chain risk within a particular sector.**

By using this approach to identifying and assessing modern slavery risk, Link Wentworth suppliers are classified according to assessed risks attaching to suppliers/investments own supply chains down to the ninth level of sub-supplier.

The following Australian supplier categories with potentially elevated risks were identified for Link Wentworth's direct procurement spend during the reporting period:

### Supplier categories with potentially elevated risk

 Construction Work and Related Services

 Textiles

 Business Services

 Hotels and Restaurants

In last year's Statement we provided a brief description of how, even in Australia, modern slavery risks can be potentially heightened, on a sector-wide basis, in relation to Construction Work (operational and supply chains), Business Services (supply chains) and Textiles (supply chains).

**Australian Hotels and Restaurants is a newly flagged risk category for this reporting period.**

One area of reliance on this sector is through Link Wentworth's use of hotel accommodation to temporarily house homeless individuals who are awaiting more long-term housing solutions. In FY25, Link Wentworth experienced increased year-on-year spend on this category, representative of a general increase in homelessness in Australia. Link Wentworth anticipates that this trend and increased spend will continue into future reporting periods.

Link Wentworth acknowledges that whilst the overall incidence of modern slavery in Australia is low, Australian accommodation and hospitality services carry a relatively increased modern slavery risk because of the nature of workers and services procured from this industry.

For example, accommodation services have a proportionally higher incidence of potentially vulnerable migrant workers who may be less aware of their worker rights and less willing to report or seek support for exploitation. The accommodation and hospitality industries also depend heavily on Australian and international agriculture, where worker exploitation is heightened.

## Governance

Link Wentworth's Chief Communication Officer has day-to-day responsibility for implementing our approach to modern slavery risk identification, assessment, mitigation and reporting.

**The Link Wentworth Board retains ultimate oversight for modern slavery issues.**

## Policy and Internal Training

Key anti-slavery policies described in Link Wentworth's previous Statements continued to apply.

As foreshadowed in last year's Statement, this year saw the granting of formal internal approval for several updates made to policies in the last reporting period, including:

- » Purchasing Policy (approved 27/2/25)
- » Investment Policy (approved 13/2/24)
- » Maintenance Contractor Engagement Management (approved 27/2/25)

Link Wentworth continues to provide and encourage the completion of a Modern Slavery e-learning module to all staff and Directors.

## Supplier Engagement and Due Diligence

As foreshadowed in last year's Statement, Link Wentworth undertook direct supplier engagement with two (2) merchandise suppliers, which included confirmation of the nature and extent of those companies' responses to potential areas of elevated modern slavery risk in their own supply chains, including by review of these suppliers' Modern Slavery Statements (where available) and review of internal policies and processes.

**Link Wentworth also included clauses that specifically address modern slavery issues in its Builder and Consultant Contracts.**

These clauses were first used in Builder Contracts in FY24, as reported in last reporting period's Statement. The inclusion of anti-slavery provisions in Consultant Contracts was a further expansion for this reporting period (these provisions being applicable to 12 contracts in the reporting period).

## Grievance Mechanism and Remediation

Link Wentworth did not receive any reports of, or otherwise identify, any incidents of actual or suspected modern slavery in its operations or supply chain in the reporting period.




Concerns or complaints about potential or alleged breaches of law or policy can be reported in accordance with Link Wentworth's Complaints and Feedback Policy.

# Measuring Effectiveness

As foreshadowed in last year's Statement, Link Wentworth has continued the process of developing a more formal approach to measuring the effectiveness of our overall response to potential issues of modern slavery risk.

Our developing approach measures Link Wentworth's actions against four key response pillars:

## Key response pillars

-  Governance and Accountability
-  Risk Assessment & Due Diligence
-  Training & Awareness
-  Remediation & Grievance Mechanisms

Our actions under each pillar will be measured against several relevant Key Performance Indicators ('KPIs'), including:

- » Frequency of Board/Subcommittee updates (target: quarterly)
- » Demonstrated evidence of modern slavery risk being integrated into risk registers
- » % of new suppliers screened for modern slavery risks (target: 100%)

**The final version of the Framework is planned to be formally endorsed and implemented in the next reporting period.**





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