

2025
Modern Slavery Statement
Ability Options



AbilityOptions





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Reporting Entity: Ability Options Ltd

ABN: 92 003 175 335

Reporting Period: [2025]

Principal Governing Body Approval: Approved by the Ability Options Board on 27 November 2025

Responsible Member Signature: [Dr Robert Lang, Chair]

Introduction

This statement is made pursuant to Section 31 of the Modern Slavery Act 2018 (New South Wales) and Section 16 of the Modern Slavery Act 2018 (Commonwealth) and constitutes our Modern Slavery Statement for the financial year ending 30 June 2025.

This statement was approved by the board of ABILITY OPTIONS LTD on 27 November 2025 in their capacity as principal governing body. The board of ABILITY OPTIONS LTD approved this statement on behalf of ABILITY OPTIONS LTD and its additional reporting entities, covered by the statement:

COFFS HARBOUR EMPLOYMENT SUPPORT SERVICES LTD (CHESS): 91 677 106 763

R&R CARE LIMITED: 76 244 506 809

OLYMPUS SOLUTIONS LTD: 17 602 309 740

Consultation Statement

All entities covered by this Modern Slavery Statement share the same Board of Directors. As governance and decision-making are centralised at Board level, there is no requirement for separate consultation between entities. This unified governance structure ensures consistent oversight and accountability across all operations and supply chains.



Message from our CEO – Julia Squire

At Ability Options, we believe that every person deserves dignity, respect, and the opportunity to thrive. Our vision, to inspire and lead communities, creating opportunity and services for people to participate fully in society and our mission, to support people who need assistance to achieve their aspirations and inclusion in the community are underpinned by our core values of Trust, Respect, Leadership, Inclusion, and Courage. These principles guide every decision we make and every service we deliver.

We acknowledge the profound responsibility placed upon us by the Modern Slavery Act 2018 (Cth) and are

committed to meeting and exceeding its obligations. Modern slavery is incompatible with our values and our purpose. We recognise that addressing these risks is not only a legal requirement but a moral imperative that reflects who we are as an organisation.

Our approach is proactive and collaborative. We work closely with our suppliers, partners, and stakeholders to ensure transparency and accountability across our operations and supply chains. Through robust policies, ongoing risk assessments, and continuous improvement, we strive to eliminate any possibility of modern slavery practices within our sphere of influence.

The purpose of this statement represents our unwavering commitment to ethical practices and human rights. It is a reflection of our values in action—**Trust** in our processes, **Respect** for every individual, **Leadership** in driving change, **Inclusion** in creating safe environments, and **Courage** to confront challenges head-on.

Together, we will continue to champion fairness, equality, and integrity in everything we do.

Julia Squire

CEO, Ability Options Ltd

Our Driving Forces

We pride ourselves on delivering services that meet our Values. We highlight participants rights to opportunity, choice, and self-determination, connecting them with the support and tools that participants need to achieve their goals.

Our **Vision**

To inspire and lead communities, creating opportunity and services for people to participate fully in society

Our **Mission**

To support people who need assistance to achieve their aspirations and inclusion in the community.

Our **Values**

Our values are critical to our Vision and Mission, they embody our common purpose, and they encourage behaviours which enable us to meet our goals.



Trust we deliver on our promises, encourage feedback and work with honesty and openness



Courage we act on our values ensuring they are central to everything we do



Lead we are a sector and service leader by innovating, improving and partnering with others



Inclusion we embrace, encourage and support diversity in everything we do



Respect we treat our participants, their families, communities, partners and each other with dignity, appreciation and recognition



About us

Ability Options is a leading Australian not-for-profit organisation dedicated to advancing inclusion, independence, and opportunity for people with disability and those experiencing disadvantage. Established almost 50 years ago, Ability Options has grown to become one of the largest providers of disability and employment services in New South Wales, delivering person-centred supports that enable individuals to live life to the fullest.

Our organisation operates under a robust governance framework, with strategic oversight provided by our Board of Directors and operational leadership by our Chief Executive Officer and Executive Team. Ability Options employs over 1,500 staff and supports thousands of participants annually through a diverse portfolio of services, including Supported Accommodation, Community living & social participation and employment services. These services are delivered across metropolitan and regional communities, reflecting our commitment to equitable access and social impact.

As a registered charity and reporting entity under the **Commonwealth Modern Slavery Act 2018**, Ability Options acknowledges its responsibility to respect and uphold human rights in all aspects of its operations and supply chains. Our supply chains encompass a wide range of goods and services essential to service delivery, including property and facilities management, technology solutions, transport, and workforce services. We recognise that these supply chains may involve complex networks, including subcontractors which can present heightened risks of modern slavery.

Freedom from slavery is a fundamental human right. Ability Options is committed to identifying, assessing, and addressing modern slavery risks. This Modern Slavery Statement demonstrates our proactive approach to transparency, accountability, and continuous improvement. It outlines the steps we are taking to safeguard human rights, strengthen ethical practices, and ensure that our operations and supply chains reflect our values.

Our registered office is located at
Suite 1, Level 2, West Wing
1 Woolworths Way
Bella Vista NSW 2153

Australian Business Number (ABN) is
[ABN 92 003 175 335].

For inquiries related to this statement, please contact Quality Assurance,
qualityassurance@abilityoptions.org.au

Our Structure

Ability Options operates under a robust governance framework designed to ensure accountability, transparency, and ethical decision-making across all aspects of our organisation. Our governance structure is headed by a highly competent **Board of Directors**, which provides strategic oversight and ensures compliance with legislative and regulatory obligations, including those under the **Commonwealth Modern Slavery Act 2018**. The Board is committed to upholding the highest standards of corporate governance and ethical practice, recognising that strong leadership is critical to safeguarding human rights and addressing modern slavery risks.

The Board is supported by our **Chief Executive Officer (CEO)**, who brings a long and distinguished history in the Human Services sector. With decades of experience leading organisations that deliver disability and community services, our CEO has a deep understanding of the complexities of service delivery and the importance of embedding human rights principles into organisational culture and practice. This expertise ensures that our approach to modern slavery is informed by sector knowledge, practical experience, and a commitment to continuous improvement.

Our **Executive Leadership Team** complements this capability with extensive experience across both



Disability Services and corporate roles. This combination of sector-specific knowledge and commercial acumen positions Ability Options to effectively identify, assess, and respond to modern slavery risks within our operations and supply chains. The Executive Team oversees key functional areas, including service delivery, procurement, risk management, and compliance, ensuring that modern slavery considerations are integrated into organisational policies, processes, and decision-making frameworks.

Together, the Board, CEO, and Executive Team provide strong leadership and governance that prioritises ethical conduct and human rights. This governance structure enables Ability Options to meet its obligations under the Modern Slavery Act and to drive a culture of accountability and transparency. Through clear oversight, informed decision-making, and a commitment to best practice, we are well positioned to manage modern slavery risks and uphold our responsibility to protect the rights and dignity of all people connected to our organisation.



Operational Structure & Service Footprint

Ability Options operates through a structured and integrated model that ensures effective governance, service delivery, and compliance with the Commonwealth Modern Slavery Act 2018. Our operational framework supports accountability and responsiveness across all regions and service areas, enabling us to deliver high-quality supports while embedding ethical practices and human rights principles throughout our organisation.

The organisation is structured into three core divisions: Disability Services, Specialist Services, and Corporate Support Functions. Each division is led by experienced Executives who report directly to the Chief Executive Officer, ensuring clear lines of responsibility and decision-making. This structure facilitates strong oversight and enables modern slavery risk management to be incorporated into procurement,

workforce practices, and service delivery. Ability Options delivers services across a broad geographic footprint in New South Wales, including metropolitan, regional, and rural communities.

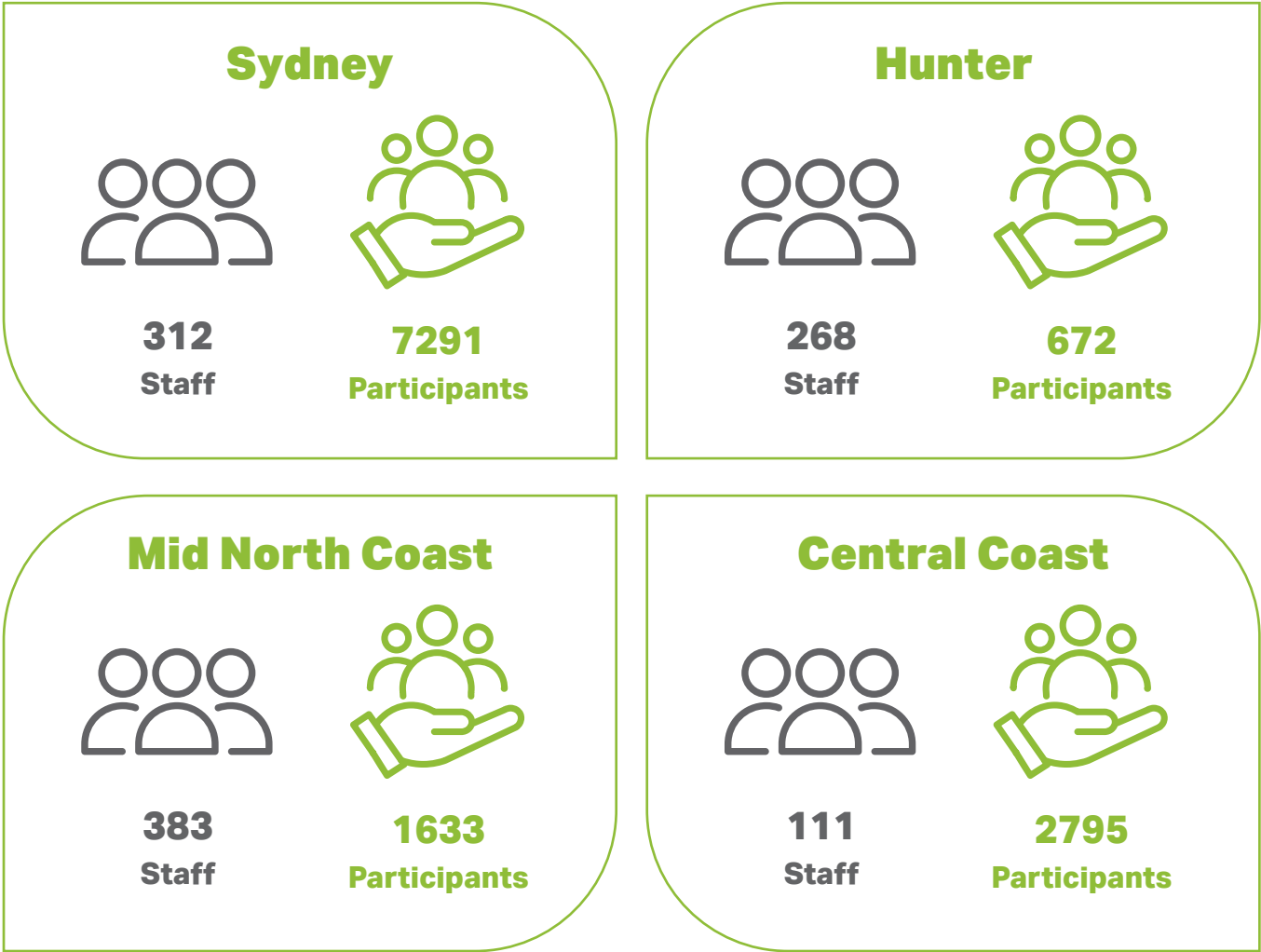
Across these regions, our service portfolio includes:

- Shared Independent Living (SIL),
- Community Supports, in both group and individualised settings,
- Short-Term Respite,
- Medium Term Accommodation and
- Therapy Services.

Our Specialist Services include:

- Support Coordination,
- Plan Management,
- Employment Services,
- Low Intensity Mental Health supports and
- Counselling.

Our primary regions of operation and approximate staffing and participant numbers are:



Services are delivered through a network of offices and community hubs, supported by mobile teams to ensure accessibility for participants.

This operational structure, combined with our governance framework, positions Ability Options to effectively manage compliance obligations and integrate modern slavery risk assessments into everyday practice.

By maintaining strong regional leadership and central oversight, we ensure that our commitment to human rights and ethical conduct is consistently applied across all areas of our operations and supply chains.



Our Supply Chain

As a large disability service provider, Ability Options relies on a diverse range of supply chains to support service delivery. These include:

- property and facilities management,
- cleaning and maintenance services,
- IT hardware and software,
- telecommunications,
- medical and assistive equipment,
- transport and fleet services
- catering.

Ability Options' Reconciliation Action Plan (RAP) commits us to engaging and supporting First Nations businesses within our supply chain. This objective reflects our broader commitment to social responsibility and inclusion, ensuring procurement practices not only reduce modern slavery risks but also contribute to economic empowerment and equity for Aboriginal and Torres Strait Islander communities.

We actively seek opportunities to partner with Indigenous suppliers and incorporate these principles into our procurement strategy.

Our supply chains are diverse, with goods and services being purchased from domestic suppliers in regional and metro areas as well as international suppliers in the Asia-Pacific region, North, South and Central America.

Modern Slavery Risks

Ability Options identifies and assesses modern slavery risks in accordance with our Enterprise Risk Management Framework (ERMF), which is aligned with ISO 31000:2018 principles and embedded across all organisational processes. Modern slavery is recognised as a strategic risk within our Enterprise Risk Register, and is assessed using our structured five-step process: Identify, Assess, Control, Review, and Report. This includes applying our Three Lines of Defence model, ensuring frontline accountability, independent oversight, and Board-level governance through the Audit, Risk & Finance Committee.

As part of our risk mitigation strategy, We prioritise Australian-based procurement, particularly for technology and data services, to maintain compliance with ISO 27001 Information Security Management standards and reduce exposure to high-risk jurisdictions. Despite this, we acknowledge that onshore procurement does not eliminate modern slavery risks. Vulnerabilities can still exist in sectors such as cleaning, catering, labour hire, transport and fleet, where migrant workers or subcontracting arrangements may increase risk.

Identified Risk Areas

Due to the controls and systems Ability Options has in place to manage recruitment and subcontracting, the risk of modern slavery within our direct

services is low. We recognise, however, that there are inherent risks in the supply chains of goods and services we procure, and these require careful oversight and management.

As a leading disability service provider in NSW, Ability Options has identified procurement categories that present heightened modern slavery risks due to global supply chain complexity, raw material sourcing, and labour practices. A review of our supply chain identified higher-risk areas relating to:

- **Audiovisual, IT and multimedia equipment** – linked to exploitative practices in mineral extraction and component assembly in high-risk countries.
- **Medical supplies and personal protective equipment (PPE)** – often sourced from regions with weak labour protections and high prevalence of forced labour in manufacturing.
- **Catering supplies** – agricultural production and food processing may involve forced labour or poor working conditions.
- **Janitorial and domestic services** – cleaning and maintenance services can employ vulnerable migrant workers at risk of coercion or debt bondage.
- **Stationery and office supplies** – paper and related products may originate from regions with poor labour standards.



Our Risk Management Approach

Ability Options addresses modern slavery risks through a structured and integrated approach under our Enterprise Risk Management Framework (ERMF), which forms part of our broader governance system. Modern slavery is recognised as a strategic risk within our Enterprise Risk Register, and our actions are designed to identify, prevent, and mitigate these risks across operations and supply chains.

Modern slavery risk management is embedded into our organisational processes through:

- **Enterprise Risk Register** – Modern slavery is recorded as a key risk, assessed using our 5x5 risk matrix for likelihood and consequence, and monitored against Board-approved risk appetite.
- **Preventative, Detective, and Corrective Controls:**
 - **Preventative:**
 - ◆ Policies & Procedures - Ability Options maintains a comprehensive suite of policies and procedures that govern procurement, supplier engagement, and workforce practices. These policies are regularly reviewed to ensure alignment with legislative requirements, including the Commonwealth Modern Slavery Act 2018, and global best practice standards.
 - ◆ Training - Ability Options delivers targeted training programs to staff and managers on identifying modern slavery indicators and reporting concerns. In the coming year, we will expand this with robust training for frontline managers and embed modern slavery awareness into co-design Participant Advisory Committees.
 - ◆ Due diligence processes, including supplier screening, contractual obligations, and compliance checks.
 - **Detective:**
 - ◆ Internal audits and compliance monitoring - Compliance is monitored through internal audits, external accreditation processes, and quarterly

reporting to the Audit, Risk & Finance Committee. Breaches of contractual or legislative obligations trigger remediation or termination processes.

- **Corrective:**

- ◆ Continuous Improvement - Ability Options reviews its risk management practices annually and updates controls based on emerging risks and global best practice. Planned actions for the next reporting period include:
 1. Enhancing policy maturity and governance frameworks.
 2. Strengthening supplier engagement and audit processes.
 3. Increasing awareness through targeted training and stakeholder engagement.
- ◆ Grievance Mechanisms - Ability Options maintains a confidential and accessible grievance mechanism that enables employees, contractors, suppliers, and other stakeholders to report concerns related to modern slavery or unethical practices. Key features include:
 1. Multiple reporting channels (internal hotline, email, and anonymous reporting options).
 2. Clear guidance on how to raise concerns safely without fear of retaliation.
 3. Integration with our Whistleblower Policy, ensuring protections for those who report suspected breaches.
 4. Accessibility for vulnerable groups, including people with disability and culturally diverse communities, through plain language and alternative communication formats.
- ◆ Escalation procedures. - Reports received through grievance mechanisms are managed under a tiered escalation process:
 1. Initial Review: Concerns are assessed by the Quality, Practice & Assurance team to determine severity and urgency.
 2. Investigation: High-risk cases are escalated to senior management and, where necessary, external legal or compliance experts.
 3. Executive Oversight: All confirmed or significant allegations are reported to the Audit, Risk & Finance Committee and the Board.
 4. Remediation: Where modern slavery is identified, Ability Options works with affected parties to provide remedy, which may include contract termination, supplier engagement for corrective action, and support for impacted individuals.

These measures ensure that modern slavery considerations are integrated into procurement decisions and that any identified risks are managed in line with our governance and risk appetite.



Statement from the Chair

"At Ability Options, we recognise that addressing modern slavery risks requires more than compliance—it demands accountability, transparency, and a culture of continuous improvement.

To **measure the effectiveness** of our actions, we have embedded robust monitoring and review processes within our Enterprise Risk Management Framework. These include regular internal audits, supplier performance reviews, and quarterly reporting to the Audit, Risk & Finance Committee. We also track key indicators such as staff training completion, supplier compliance with contractual obligations, and the utilisation of grievance mechanisms.

Our **commitment to continuous improvement** is unwavering. Each year, we review our risk management practices, procurement processes, and modern slavery controls to ensure they remain fit for purpose and responsive to emerging risks. We actively seek opportunities to strengthen our approach through stakeholder engagement, industry collaboration, and alignment with global best practice standards, including the UN Guiding Principles on Business and Human Rights.

In the coming year, we will take further steps to enhance our maturity in this area. This includes refining and strengthening our policies and processes, delivering more robust and targeted training programs for frontline managers, and embedding modern slavery awareness into our co-design Participant Advisory Committees.

These actions will ensure that our commitment to human rights is not only understood at every level of the organisation but actively championed by those closest to the people we support.

As Chair, I affirm that Ability Options will continue to evolve its strategies to protect human rights and uphold ethical standards across all operations and supply chains. This is not just a regulatory obligation—it is a reflection of our values and our responsibility to the communities we serve."

Dr Robert Lang

Chair of the Board, Ability Options



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