



Modern Slavery Statement

For the financial year ended 30 June 2023

Level 4, 507-509 Kent St
Sydney NSW 2000
www.altius-group.com.au



MANDATORY CRITERIA

Identify the reporting entity

Altius Group is the reporting entity that has prepared this Modern Slavery Statement for the financial year ended 30 June 2023 (FY23).

The Altius Group consists of the Parent Company, Altius Holdco Pty Ltd and all subsidiaries, namely:

Parent Company

Altius Holdco Pty Ltd

ABN

22 646 640 280

Operational Entities

Altius Group Holdings Pty Ltd

Altius Group Pty Limited

Ayres Management Services Pty Ltd

Career Shift Pty Ltd

CIM Group Holdings Pty Ltd

Innovative Physiotherapy Services Pty Ltd

Occhealth Network Pty Ltd

Ontime Health Agency Pty Ltd

Ontime Medical Reports Pty Ltd

PeopleSense Pty Ltd

Rehabilitation Services Pty Ltd

Risk Consulting by Altius Pty Ltd

Business Name

Altius Group

AltiusLife

AMS Consulting Group (Aust)

Realm Rehab

CIM Employment by Altius

Nabenet

OccHealth by Altius

Ontime Healthcare, Ontime Homecare, and On Time Nurses

International Independent Medical Examiners IIME

PeopleSense by Altius

Rehabilitation Services by Altius

Psychological Health Interventions by Altius

99 603 911 020

87 123 631 676

45 087 711 644

84 161 037 841

13 607 671 198

29 103 180 034

64 123 632 388

81 612 474 398

31 612 807 851

88 103 691 916

99 124 265 523

84 092 603 382

Service Entities

Altius Bidco Pty Ltd

Altius Group Services Pty Limited

Altius Midco Pty Ltd

Forean Holdings Pty Ltd

Nabenet Holding Pty Ltd

Ontime Diversified Pty Ltd

28 646 640 744

66 123 922 761

92 646 640 637

68 098 191 970

38 137 597 589

79 610 339 154



MANDATORY CRITERIA

Describe the reporting entity's structure, operations and supply chains

Altius Group is a leading integrated workplace health and wellbeing organisation. We provide premium end-to-end solutions to support businesses and people in restoring their physical and mental health. Altius Group's purpose is to elevate the wellbeing of every person, business and community.

Our Services include:



Workplace Services

We work with organisations to ensure the workplace is safe, and the health and wellbeing of their employees is elevated. Our Services include: Workplace Health and Safety, Occupational Rehabilitation Services, Wellbeing Services, Organisational Psychology, Return to Work Coordination, and Independent medico-legal assessments.



People & Employee Services

At an organisational level, we support healthy workplaces. On an individual level, we help to optimise client's mental health and wellbeing. Our services include: Employee Assistance Programs, Critical Incident Response, Movement and Work Conditioning Programs, Mediation, Therapeutic Services, and Mental Health treatment.



Disability Services

We are a NDIS -accredited therapy provider and a Disability Employment Services provider (DES). We deliver person-centred programs to those living with a disability. Our Services include: In Home Care, Employment Services, and NDIS Services.

In addition to the NDIS, we also provide in-home personal care and domestic assistance services to the aged care sector. Through our subsidiary, Ontime Healthcare, we also supply Nurses and Personal Care Assistants to a range of clients including hospitals, residential aged care facilities and correctional facilities.



Medical Specialists

Altius Group provides the services of medical specialists for medico-legal assessments. Clients receive detailed, high quality and unbiased reports, and informed, clear, patient-focused independent medical opinions.

Our Brands:



As a multidisciplinary team of allied health professionals including occupational therapists, clinical and organisationally-trained registered psychologists, physiotherapists, exercise physiologists, osteopaths, vocational and career professionals, and workplace rehabilitation counsellors, we are able to work collaboratively to develop and deliver tailored, timely, holistic solutions.

The Altius Group employs 750 team members in full-time, part-time and casual roles. Team members work in over 70 offices, geographically spread across Australia, including all the state and territory capital cities.

Altius Group is committed to managing our business in a manner that reflects our high ethical and moral values, and we are committed to upholding human rights, fair working conditions, and environmental protection.

MANDATORY CRITERIA

Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

Altius Group operates multiple business units across the allied healthcare industry, its supply chain is managed centrally by the Finance team who are well trained in the understanding of modern slavery risks.

Risks in Operations

Altius Group is compliant with Australian employment law and professional practices for the recruitment, remuneration, and working conditions, of employees. On an ongoing basis, employees' remuneration is mapped to relevant award rates to ensure compliance and no gaps in compensation. Altius Group have appropriate policies and procedures in place to ensure the protection and fair treatment of its employees. These policies include:

- Work Health and Safety Policy
- Recruitment and Selection Policy
- Professional Development Policy
- Promotions Advancement and Transfers Policy
- Diversity and Inclusion Policy
- Personal Safety Policy

There is minimal risk in relation to modern slavery in our employment practices and operations.

Risks in Supply Chains

The majority of goods and services procured for Altius Group are from suppliers located in Australia. For FY23, 0.8% of suppliers were located overseas in countries that have a low prevalence and low vulnerability to modern slavery in accordance with the *Walk Free Global Slavery Index* (<https://www.walkfree.org/global-slavery-index/map/#mode=map>).

Our main suppliers come from the following industries:

- Building and construction
- Commercial property rent and building maintenance
- Hospitality and cleaning
- Human resources and recruitment
- Information technology
- Insurance, professional services, and consulting fees
- Marketing and communications
- Motor vehicle
- Office supplies
- Telephone and internet

We have performed a review of all suppliers to Altius Group for FY23, and based on the industry they belong we have completed an assessment of our risk in regard to modern slavery in our supply chain. Those industries considered higher risk are Cleaning and Information Technology. Following a review of our spend, we can conclude that there is only a small proportion in the high-risk category.

	POTENTIAL HIGH RISK	POTENTIAL MEDIUM RISK	POTENTIAL LOW RISK	TOTAL
Spend Categories	Hospitality and Cleaning	Information Technology, Human Resources and Recruitment	Insurance, Professional Services, Consulting Fees, and Other	
% of spend	1.38%	21.23%	77.38%	100%

MANDATORY CRITERIA

Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

Risks in Operations

Altius Group provides workers with entitlements in compliance with relevant laws. Altius Group ensures workers are correctly engaged as either employees or independent contractors, and appropriate remuneration above minimum wage standards and entitlements including applicable superannuation are paid accordingly. A register of contractors is maintained. On an annual basis, Altius Group performs a full review of salary and other remuneration benefits to ensure all staff are paid above award and are receiving their full entitlements. Altius Group have a dedicated People & Culture team monitoring legislative and market changes.

Altius Group will continue to monitor remuneration and working conditions. Our internal policies also reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business.

We believe we have the policies and systems in place to clearly identify any inappropriate employment practices, and identify, assess, and monitor potential risk areas.

We did not identify any modern slavery risks in operations in FY23.

Risks in supply chains

Altius Group has conducted a due diligence exercise on its suppliers including mapping to industry sectors they belong to and requesting high value suppliers' complete questionnaires on their modern slavery approach, to show what steps they have taken to address modern slavery risk in their own organisation and supply chain. The questionnaire responses have been reviewed to highlight risk, and public data has also been examined. As part of these investigations into the Altius Group supply chain consideration was given to the products being acquired and their source of production. Suppliers that responded concluded that there was minimal risk within their entities or operations.

To ensure all those in our supply chain comply with our values, prior to entering into agreements with suppliers, we conduct a risk assessment which ensures clearly defined ethical working practices.

Altius Group has also raised awareness amongst its own employees to understand modern slavery issues to help mitigate risk. All team members on-boarded are provided guidance with our policies and procedures including our Ethical Sourcing and Modern Slavery Policy. We have a Procurement Policy to ensure the appropriate level of management is required for authorisation of all purchases, and that key ethical considerations form part of this approval.

We have zero tolerance to modern slavery. Following an investigation, any employee who breaches the Ethical Sourcing and Modern Slavery Policy will face disciplinary action, which could result in dismissal for misconduct.

Should modern slavery risks be identified in our supply chain, these would be thoroughly investigated, engagement with the supplier would be terminated and information would be passed onto government authorities.

In FY23 Altius Group did not identify any modern slavery risks in its supply chain.

For FY24 it is planned that modern slavery questionnaires will be issued to new material suppliers as part of the onboarding process, to ensure modern slavery risk is minimised before engaging a supplier. Also, another key initiative will be to openly engage with suppliers to properly understand where the products and/or services are sourced.

We will continue to educate by providing relevant training to our team members.

MANDATORY CRITERIA

Describe how the reporting entity assesses the effectiveness of these actions

Altius Group has reviewed the response rate and data disclosed on supplier questionnaires. Many of Altius Group's suppliers include small businesses working in regional areas of Australia who don't necessarily know the risk of modern slavery within their own organisations. It is hoped that by increasing awareness in our supply chain, we are reducing risk and increasing transparency.

Our efforts for FY23 have related to Tier 1 Suppliers, that is suppliers that supply goods and services direct to Altius Group. With Tier 1 suppliers we have researched the companies and had verbal conversations with management before engagement to ensure that there are no obvious modern slavery risk factors or suspicions. In future years it is anticipated that our due diligence reviews will reach further down the supply chain to Tier 2. We will continue to work with our suppliers to identify any risks, and should such risks be identified, they will be investigated appropriately.

MANDATORY CRITERIA

Describe the process of consultation with any entities the reporting entity owns or controls

(a joint statement must also describe consultation with the entity giving the statement)

This Modern Slavery Statement has been prepared with the support of all General Managers of each operational entity with the assistance of the shared Group Services resources. This report covers Altius Holdco Pty Ltd and its eighteen wholly owned subsidiaries, without exception.

MANDATORY CRITERIA

Provide any other relevant information

Altius Group will continue to monitor for modern slavery risks and take mitigation action where necessary.

Conclusion

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) for Altius Group and relates to the financial year ended 30 June 2023.

This statement was approved by the Altius Group Board on 22 November 2023.

Nicole Mills

Company Secretary
Altius Holdco Pty Ltd