



Unity Through Enterprise
The Arnhem Land Progress
Aboriginal Corporation



The Arnhem Land Progress Aboriginal Corporation (ICN 7137)

Modern Slavery Statement

Pursuant to the Modern Slavery Act (Cth) 2018

The Arnhem Land Progress Aboriginal Corporation (herein after referred to as "ALPA") is an Aboriginal Corporation registered under the *Corporations (Aboriginal and Torres Strait Islander) Act 2006. Addendum 1* hereto is a detailed history of the ALPA Group.

As the largest Independent Aboriginal Corporation in Australia, ALPA leads the way in Remote Retailing operating 28 community stores in the Northern Territory and Far North Queensland, Community Service Program Delivery, Enterprise, and Economic Development and Corporate Services. By generating surplus through economic independence, we are able to invest in community care funds for our Yolngu communities.

Everything ALPA does is focused on training, developing skills, creating jobs, and developing sustainable businesses for Yolngu (Indigenous people of Arnhem Land) to build an economy in our communities and our region.

In addition to ALPA proper, ALPA owns (or partially owns) the following subsidiary enterprises:

- 1. Rulku Enterprises** is a joint venture with Milingimbi traditional owner organisation, Rulku Family Pty Ltd. The joint venture predominantly operates the Rulku Accommodation lodge in Milingimbi. There is also a civil labour hire component.

2. Dinybulu Regional Services is a joint venture with Ramingining traditional owner organisation, Bulungkunum Pty Ltd. The joint venture predominantly operates the Dinybulu Accommodation lodge in Ramingining, the mechanical workshop in Ramingining, the homelands services team and a labour hire component.


3. Island & Cape Retail Enterprises is a wholly owned subsidiary enterprise which operates retail stores in remote regions throughout Queensland and the Torres Strait. By virtue of ALPA's status as a Registered Training Organisation, training is also provided to staff of Island & Cape Retail Enterprises.

4. Bukmak Constructions is a wholly owned subsidiary enterprise and its purpose is to carry out concreting and construction works in remote communities throughout the

Northern Territory.

5. Manapan Furniture is a wholly owned subsidiary enterprise and it operates out of a furniture factory based in Milingimbi and produces bespoke furniture, produced by Yolngu Craftspeople as a result of partnerships with world-renowned designers. It has a high focus on skills and training for graduates from the Manapan Academy (currently being run as a CDP activity.)

During the reporting period this statement covers, we actively engaged and consulted with all companies we own or control in the development of this statement (entity's outlined in attachment A). We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with




relevant materials and updates.

The ALPA Group is committed to upholding human rights with respect to our own employees and for workers within our supply chain. We are committed to preventing our own involvement (and the involvement of our suppliers) in modern slavery. We stand with the Commonwealth in their desire to combat modern slavery more widely and welcome the reporting obligations of the *Modern Slavery Act (Cth) 2018* (herein after referred to as "The Act") as a tool to combat modern slavery.

During our reporting period all divisions of ALPA were engaged and our approach was companywide. We have implemented further measures to mitigate modern slavery risks within our organisation by ensuring

divisional leaders and team members are aware of our obligations. It has been identified that our focus on indigenous and cultural rights is to remain a key focus as we operate in areas where members are vulnerable to economic and social wellbeing, through the power of enterprise we continue to offer strong community development programs and offer training and employment to community members where ALPA operate.

We recognise that modern slavery is a complex problem and one which requires a committed and targeted approach by our Board, Executive and employees. We set clear expectations of our employees and suppliers (including contractors and agents) and are actively working to prevent and address any potential



modern slavery in our supply chain.

In addition to the Act, ALPA is guided by the United Nations Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.

Within our own organisation (and our wholly and partly owned subsidiary enterprises) we are compliant with the *Fair Work Act 2009* and the relevant award wages throughout the diverse range of industry sectors within which we operate.

We are subject to a significant number of Australian Federal, State and Territory statutory obligations, an exhaustive list of which would be too lengthy to list here and would provide little value to the public in identifying

whether ALPA is taking sufficient action to address the risk of modern slavery existing in our supply chain.

However, to compliment these legislative requirements, ALPA has internally developed and implemented an *Ethical Sourcing and Modern Slavery Policy* and an *Employing Minors in the Workplace Policy* which set out ALPA's commitment to preventing modern slavery in our businesses.

It was apparent to ALPA in around October 2019 that we would be subject to reporting obligations under the Act. We immediately briefed our Chairperson, Rev Dr Djiniyini Gondarra OAM, and our Deputy Chairperson, Micky Wunungmurra, who instructed us to pull together a team of Executive and Senior Management in order to commence the project of mapping and examining our supply chain across the ALPA Group (including its subsidiary enterprises.) The

team briefed managers of all four of ALPA's divisions and. The Board has been kept apprised of progress at quarterly intervals.

In excess of 100 suppliers and providers have been contacted since the commencement of that task. All suppliers have been mapped on a matrix which identifies the level of risk a supplier poses, based on an objective assessment which incorporates, amongst other things:

1. The sector or industry within which the supplier operates (and therefore whether their labour is predominantly unskilled or seasonal, subject to short term contracts or outsourcing or may be made

up of foreign workers or those on temporary visas)

2. The product or service the supplier offers (and therefore whether they offer unrealistically short turnarounds on delivery, or products which change frequently with seasonal trends, or may offer products sourced from high risk countries¹.

3. The supplier organisation itself (particularly in respect of their governance structure, track record in human rights, management, procurement and auditing processes and formalised policies and procedures.)

4. The supplier's geographic location or shoring (and therefore what legislation they are subject to, whether there is adequate protection for workers under any such legislation, whether there

1

<https://www.globallslaveryindex.org/>

were risks of poor governance and/or weak rule of law in the region and whether there was conflict or a risk thereof in the region)

5. Hidden risks (for example, little visibility or oversight of workers)

Once these risks had been mapped and each of the suppliers had been assigned a risk rating, suppliers were contacted by ALPA and apprised of ALPA's expectations of them if they were to continue to remain a preferred supplier of ALPA.

ALPA recognises that it would be almost impossible to guarantee that there is no risk of modern slavery existing within our supply chain. However, we took a risk-based approach to considering each suppliers' response. That is to say, the risk posed by a local meat supplier, employing 3 staff in a meatworks which is subject

to Work Health Safety, Fair Work and Public Health legislation, posed a lower risk than a supplier of general merchandise whose products were manufactured offshore. It was in the context of the individual supplier's risk rating that their response was considered. Some of ALPA's significant international suppliers were already subject to reporting obligations under the Act (themselves being considered reportable entities) and those suppliers faced a more rigorous examination of their policies and procedures.

ALPA already prioritised smaller, local suppliers as part of our mission "*... to operate successful and responsible businesses emphasising local employment, training, career pathways, customer service and safety.*

We strive to improve the health, quality of life, and economic development of our members, giving primacy to

their cultural heritage, dignity, and desire for opportunity and equality with their fellow Australians.”

Prioritising small, local suppliers encourages the development of economies in our remote communities and has, even prior to the enactment of the Act, mitigated the risk of modern slavery existing within our supply chains

It is important to note that as a leading remote area retailers ALPA has strong supply relations with large corporations that also comply with the Modern Slavery Act. Key partners such as Metcash, PFD Foods and Simon George and Sons who have direct contact with thousands of manufacturers are expected to work together with ALPA to ensure we minimise our exposure to modern slavery risks, through their knowledge and

recommendations on supporting farmers and manufacturers who themselves have ethical sourcing programs.

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward.

In this reporting period a new Procurement Policy is being developed for trial. This provides a clear standard when it comes to procedures and procurement processes across all divisions. A review to our procurement standards include modern slavery clauses and mandates

that all new and current suppliers who come due for renewal undergo due diligence checks. To assess and mitigate risk, ALPA's senior buyers who are responsible for sourcing goods and services are involved in procurement programs and ensure fair sourcing models are followed. Utilisation of tenders and quotes from multiple suppliers are reviewed and pricing is queried if it is significantly lower than competitors and market value. In our next reporting period ALPA will involve all merchandisers in further training on identifying and tracking our supplier performances in relation to ethical sourcing.

Our Corporation Secretary has identified and undertaken several professional development courses (including, but not limited to, those offered by the Australian Institute of Company Directors and the

Governance Institute of Australia) in order to educate himself (and subsequently educate our Board) as to ALPA's obligations as a reportable entity under the Act. We have, additionally, attempted to identify external training that might be administered to suppliers as part of their onboarding process, as well as investigated the possibility of offering this education on scope through ALPA's Registered Training Organisation ("RTO.") These investigations are ongoing. Furthermore, we have sought (and received positive undertakings) from some of our larger key suppliers as to any education or training programs they offer their staff on the subject of modern slavery. We look forward to continuing those discussions and ultimately identifying a more formal method of delivery of these courses.



In the intervening period, however, the supplier onboarding process has been evolved to adequately reflect ALPA's expectations of our suppliers. Our trading terms now include a specific section on the Act and our obligations thereunder. These terms were developed based on legal advice received from ALPA's respected external Solicitors and Advisors.

Essentially, ALPA's approach to combatting modern slavery can be summarised as follows:

1. Training & Education;
2. Consultation;
3. Supply chain mapping;
4. Risk assessment;
5. Addressing and remediating risks;
6. Evaluation and monitoring;
7. Policy development;
8. Governance;

Collaborative partnerships (with industry colleagues and suppliers.)

ALPA's focus is, and will continue to be, combatting modern slavery in our supply chain. We recognise our role as an industry leader in this endeavour whilst also seeking guidance from our industry colleagues.

We acknowledge that taking action to combat modern slavery also makes good business sense. Doing so can protect against damage to our business, improve member and customer confidence in our business, increase profitability and improve the integrity and quality of our supply chain.

Modern slavery is a very real risk globally, including here in Australia, and it is incumbent upon organisations like ALPA to take every step they can to prevent the damage caused by this insidious practice.

For more information on the ALPA Group's response to modern slavery please contact the Corporation secretary at ea2ceo@alpa.asn.au

This statement has been approved by way of unanimous resolution of the full board of directors on the 21st day of June 2023. Signed for and on behalf of the Board of Directors:



Mr Micky Wunungmurra
Chairperson



Ms Matjarra Garrawurra
Deputy Chairperson

