



**Modern Slavery Statement
For Reporting Period ending 30 June 2025**

Achieve Australia | Our Passion, Purpose and Principles

Achieve Australia (Achieve) has been providing services to support people with disability since 1952. Achieve delivers a range of disability services in the Greater Sydney and the Northern Rivers region of New South Wales.

In October 2024, Achieve acquired services in the southeast region of Brisbane, Queensland, following a successful tender process by Mercy Community, expanding the geographical footprint of the organisation.

During the year under review, Achieve Australia Limited responded to a tender run for the transfer of delivery obligations from St Vincent de Paul Society NSW to an alternative NDIS provider, and with effect from 1 July 2025, commenced providing Social and Community Participation Support services at 2 additional sites in Sydney.

Our **Passion** is social inclusion for people with disability.

Our **Purpose** is to build extraordinary lives, supporting people with disability to be well, have a home, choose a career, learn new skills, participate in their community and enjoy a full life.

The **Principles** of Achieve are:

- **Living inclusion:** Cultivate a sense of belonging in our organisation and community.
- **Elevating voices:** Listen and activate the voices of people with a disability.
- **Engaging practice:** Align our work to each person's ambition for a good life.
- **Growing capacity:** Develop by collaborating, listening, learning and co-design.
- **Valuing resources:** Foster cooperation, efficiency, and accountability for outcomes.

Message from the Achieve Australia Board Chair Kerry Stubbs and CEO, Jo-Anne Hewitt:

In submission of our third Modern Slavery Statement, Achieve reiterates our commitment to ensuring that as an organisation, it contributes to the eradication of modern slavery practices within Australia.

Achieve is committed to respecting and upholding the inherent dignity and human rights of all individuals who come into contact with our organisation.

Inclusion is at the core of the mission and values of Achieve. True inclusion cannot exist without upholding and championing human rights and dignity for each person.

This Modern Slavery Statement outlines our ongoing commitment, policies, due diligence, and actions taken to address modern slavery risks within our operations and supply chains.

Achieve is guided by the United Nations Guiding Principles on Business and Human Rights to prevent, address and remedy any human rights abuses committed in our business operations and supply chain. This is at the core of the purpose and passion of our organisation. Following the acquisition of services in Queensland, Achieve has also incorporated the provisions within the Human Rights Act 2019 (QLD) and the protected rights inherent in the Act into our policy and procedure, to ensure organisational compliance and oversight.

The work of the Modern Slavery Working Group (MSWG), informed by the broader organisational Environmental, Social and Governance (ESG) Strategy, has continued in this reporting period. The MSWG membership includes:

- Chief Financial Officer
- Chief People Officer
- General Counsel
- General Manager Legal
- General Manager People Shared Services
- General Manager Corporate Services
- General Manager Marketing

The MSWG has sought to strengthen our response to modern slavery risks within our supply chain and implement organisational change and education to address such risks. The cross-functionality of the working group membership has provided oversight across all relevant functions of the business, with regular feedback from operational staff members.

As an organisation, we have undertaken significant initiatives in this reporting period to identify, address and mitigate modern slavery risks within our supply chain.

These activities have been targeted towards the management of high-risk suppliers, education of both senior and frontline staff in relation to modern slavery risks and implementing supplier attestation mechanisms to further strengthen transparency in our procurement processes.

Labour hire represents a significant proportion of our Top 40 Suppliers, therefore Achieve has moved all providers to a standardised Service Agreement, with robust modern slavery compliance provisions, reporting and auditing requirements. We have also commenced moving other providers onto this standard Service Agreement.

We recognise that the prevention of modern slavery practices within our supply chain is a significant ESG goal for Achieve and will continue to prioritise this as part of our Operations, Procurement, Risk, Customer and Practice, Learning and Development, Compliance and Legal functions.

Modern Slavery

Achieve recognises that modern slavery distorts global economies, affects corporate social responsibility and has devastating social impacts on the community.

This Statement outlines the activities Achieve and its wholly owned subsidiaries take to prevent engaging in modern slavery and which are informed by the Modern Slavery Act 2018 (Cth).

Achieve Australia is committed to supporting the eradication of Modern Slavery by implementing our policies on Human Rights and Modern Slavery.

Modern Slavery is defined in the Modern Slavery Act 2018 (Cth) as conduct which would constitute:

- a) an offence under Division 270 or 271 of the Criminal Code; or
- b) an offence under either of those Divisions if the conduct took place in Australia; or
- c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Examples of what constitutes modern slavery are forms of slavery such as servitude, trafficking in persons, forced labour, debt bondage, forced marriages, sale of and/or sexual exploitation of children or sale of children for forced labour exploitation, where victims are forced to work out of fear of violence and/or intimidation.

About Achieve Australia | Governance, Structure and Operations

Achieve Australia (ABN: 49 133 306 902) is a not-for-profit organisation, a company limited by guarantee, and registered with the ACNC, employing over 1,200 employees. It is part of a wider Group, whereby Achieve Australia is the parent company, with several controlled subsidiaries.

The controlled entities are:

- Achieve Commercial Limited (ABN 63 144 947 124)
- Achieve In A Day Limited (ABN 63 144 947 188)
- Achieve In Ryde Limited (ABN 94 144 947 759)
- Achieve In Hornsby Limited (ABN 82 144 947 268)
- Achieve In Parramatta Limited (ABN 88 144 947 231)
- Achieve In Sydney Limited (ABN 84 623 564 063)
- Achieve in Inner West Limited (ABN 73 629 116 196)
- The Crowle Foundation Limited (ABN 48 059 150 604)
- Windara Communities Limited (ABN 67 127 047 303)
- On-Focus Australia Limited (ABN 87 898 155 038)
- IHA Community Housing Limited (ABN 82 144 947 204)
- The Achieve Foundation Limited (ABN 76 059 432 610)
- Cura Housing Limited (ACN 671 598 468)

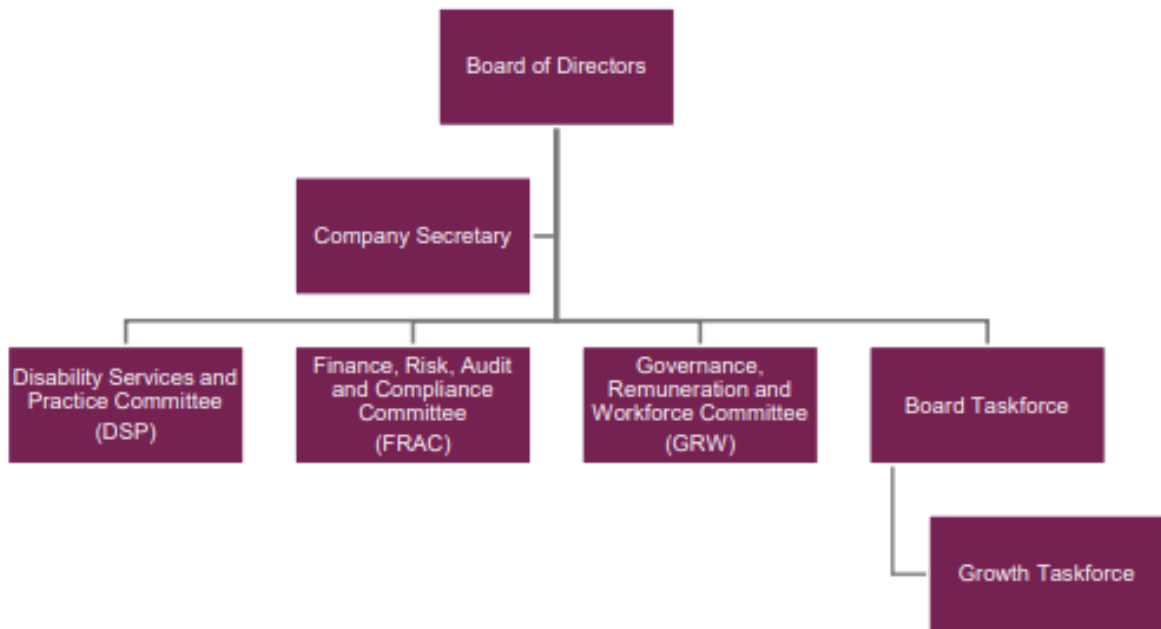
The Achieve Foundation Limited is a wholly owned subsidiary of Achieve. The purpose of the Foundation is to increase investment in disability and inclusion and build solutions at scale in disability housing and community attitudes. Achieve holds one position on The Achieve Foundation Board and has provided seed funding for their philanthropic activities.

Achieve is a 50% owner of Specialist Disability Accommodation provider, Inclusive Housing Australia (IHA) Pty Ltd. Achieve holds two positions on the Inclusive Housing Australia Board and participates in the IHA Audit and Risk Committee.

Our Board members are representatives from a range of sectors and professional backgrounds who are passionate about social inclusion for people with disability. They all have a deep understanding of how their experience and expertise can be translated into the disability sector, providing strategic guidance, expert advice and diligent governance. They are an invaluable resource in our work for people with disabilities.

The Board is committed to ensuring that our organisation robustly manages the risks of modern slavery as an integral part of its continued commitment to our passion and purpose.

The Governance structure of the Achieve Australia's Board is as follows:



Our **Executive Leadership Team** comprises of:

Jo-Anne Hewitt

Chief Executive Officer (CEO)

Wally Phillips

Chief Financial Officer and Company Secretary (CFO/CoSec)

Daniel Kyriacou

Chief Operations Officer (COO)

Angela Johnston

Chief People Officer (CPO)

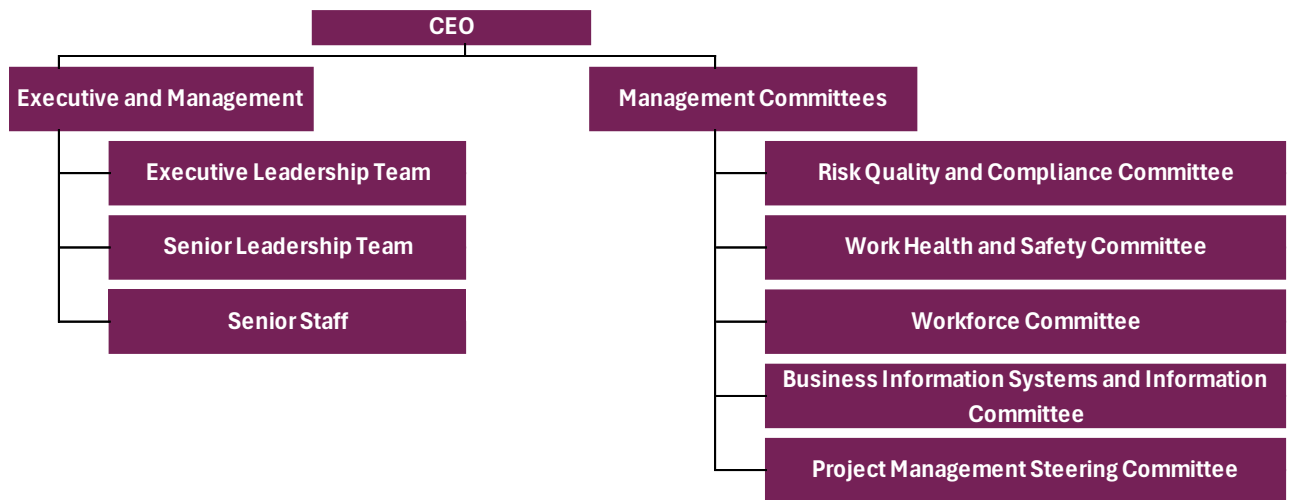
Sarah Archer

Chief Strategy Officer (CSO)

Tina McManus

Chief Customer and Practice Officer (CCPO)

The Governance Structure for the Executive and Senior Leadership Groups is as follows:



Governance Framework

The Achieve Governance Framework articulates the mechanisms through which modern slavery risks are managed and reported to the Achieve Board.

The purpose of the Governance Framework is to embed key structures, systems, and processes to enable organisation-wide accountability for the delivery of the mission, values, and strategic plan of Achieve and the management of enterprise risks within the organisation.

In 2024, the Governance Framework was amended to specifically reference modern slavery and formalise the delegated Executives responsible for modern slavery risk within Achieve, being Jo-Anne Hewitt (CEO) and Wally Phillips (CFO).

Modern slavery and broader ESG risks are monitored through our Risk Management Framework. Both Risk and Compliance are standing agenda items at both the Achieve Australia Board meetings and the Finance, Risk, Audit, and Compliance (FRAC) Committee meetings.

Embedding modern slavery within the Governance Framework and the Risk Management Framework has strengthened the organisational monitoring of this risk within our Board and Executive management structure, which drives continuous monitoring and improvement in relation to modern slavery.

Risk and Compliance Reporting

The Risk Management Framework provides the approach, process and controls to manage risk at Achieve Australia in line with the Board Risk Appetite Statement and the Risk Management Policy. The Framework outlines how our Executive and Senior Leadership Teams, managers and staff ensure that we manage risks effectively and efficiently.

The Enterprise Risk Register provides the single source of truth for information about identified risks.

The Compliance Register provides the single source of truth for information about levels of compliance with relevant legislation

Risk reporting is on the program of works for every FRAC Committee and Board meeting, aligned to the Risk Framework. Compliance reporting is also on the program of works for every FRAC Committee and Board meeting.

Operations

Achieve has been providing services to support people with disabilities since 1952. Our expert, qualified staff deliver a range of disability services in Greater Sydney, the Northern Rivers region of NSW and South-East Queensland.

The services Achieve Australia provides are as follows:

- Supported Independent Living services.
- Drop-in support services.
- Short-term accommodation and respite.
- Supported disability employment.
- The Sewing Basket, a social enterprise that sells donated fabrics, patterns, patchwork, embroidery materials, knitting and crochet yarn, haberdashery while providing employment for people with disability.
- AchieveAble Enterprises, a pack and serve service employing people with a disability.
- Windara Communities, a function centre, cafe and nursery that provides quality supported employment and training to people with disability in the Northern Rivers.

A summary of our Homes, Programs and Social Enterprises is as follows:

- 59 Community Homes, located in greater Sydney, northern rivers of New South Wales and South-East Queensland.
- 32 Apartments located in greater Sydney, NSW.
- 5 Community and lifestyle locations located in Sydney and Casino, NSW.
- 4 Sewing Basket sites located in greater Sydney, NSW.
- 1 short term accommodation centre located in Summer Hill, NSW.
- 1 Nursery and Café with function centre, meal delivery and gardening services located in Casino, NSW.

A summary of our employees and volunteers as at June 2025 are as follows:

- 1239 total Achieve employees, comprising of 395 full-time staff, 699 part-time staff and 145 casual staff members.
- 62 volunteers.
- 91 supported employees.

Achieve Australia Procurement and Supply Chain

Achieve undertakes all procurement for the Achieve Group. The procurement of goods and services is guided by the following principles, as contained within the Achieve Australia Procurement Policy:

- Procurement is carried out by authorised staff.
- Achieve obtains goods and services that meet specification, are delivered on time at competitive prices, from financially stable suppliers.
- Achieve obtains the best value for money on a total cost basis.
- Staff follow consistent procurement processes in accordance with this policy and any subsequent procedures.
- Commercial, financial, legal and operational risk is reduced by rigorous negotiation processes.
- Supplier relationship management is effective, collaborative, and focused on win-win outcomes.
- Contracts are awarded only to suppliers who best meet the requirements outlined in Achieve Australia standard tender documents.
- Procurement is ethical, and suppliers are selected and monitored to ensure compliance with modern slavery and ESG policy requirements.

Risk of Modern Slavery Practices in our Operations and Supply Chains

Actions

Achieve have undertaken an assessment of our supply chain by reference to the Global Industry Classification Standard code system.

Achieve have identified the following supplier categories as being either high or very high risk based on analysis of our top 40 suppliers and supplier categories.

Based on expenditure and risk category, the high-risk categories in the Achieve Australia supply chain have been identified as:

- Labour hire.
- Motor vehicles, particularly fleet leasing and management.
- Facilities maintenance.
- Consumables such as PPE and other medical equipment.
- Furniture for corporate office and client facilities.
- Accommodation and travel.
- Groceries and catering.

Modern Slavery and Achieve Australia | Risks, Remediation and Due Diligence

Following the identification of high-risk areas within the Achieve Australia supply chain, the following actions were implemented and monitored by the Modern Slavery Working Group.

These actions were overseen by the Executive Leadership Team, with reporting to the relevant Board subcommittees and Achieve Australia Board.

- **Review of Achieve Australia’s Human Rights and Modern Slavery Policies.**

Achieve has reviewed our current Human Rights and Modern Slavery policies to ensure ongoing compliance. These policies are mandatory learning for all new staff who commence at Achieve and are presented during induction. The policies are also mandatory e-learning annually for all staff.

- **Update to Achieve Australia’s Procurement and Contract Management Policies to strengthen Modern Slavery provisions.**

Both the Achieve Australia Procurement Policy and Contract Management Policy were reviewed and updated to strengthen the modern slavery provisions within these organisational policies. These updates were to ensure that compliance with modern slavery legislation was explicit in these core policies and thereby guiding the organisational decisions Achieve makes with respect to procurement and contract management.

- **Transition of all labour hire contractual arrangements to standardised Achieve Australia Agency Service Agreement with robust Modern Slavery provisions and auditing requirements.**

Based on the identification of labour hire as a high spend and high-risk category for modern slavery, Achieve determined that we would transition all labour hire providers to a standard Achieve Australia Agency Service Agreement. The Service Agreement provided for robust modern slavery provisions and also auditing rights to ensure compliance with the provisions within this Agreement. This transition and subsequent audit activity is outlined in a case study below.

- **Audit of Agency organisations utilised by Achieve Australia for Modern Slavery compliance.**

Based on the identification of labour hire as a high spend and high-risk category in the Achieve supply chain, Achieve undertook an audit of our top six labour hire providers in relation to compliance, with modern slavery being a focus area for the auditing team. This is outlined in a case study below.

- **Embedding human rights assessments on new and revised policies.**

In order to ensure policy and procedure compliance with human rights considerations, all new and revised policies are subject to a human rights assessment prior to endorsement. This ensures all Achieve policies are linked to human rights principles and the NDIS Practice Standards that underpin our services.

- **Identification and review of Achieve Australia's top 40 suppliers, with ongoing assessment in relation to the main types of goods and services utilised by Achieve Australia and source countries.**

As outlined earlier in this Statement, the Achieve Corporate Services team undertook a review of the top 40 suppliers to assess the primary goods and services utilised by Achieve, their source countries, and the associated risk of modern slavery practices within these goods and services and associated supply chains.

This review informed the actions undertaken by the MSWG during 2024 and future state activities

To uphold our commitment to ensuring the suppliers of goods and services to Achieve are compliant with modern slavery legislation, Achieve has implemented a vendor verification process. All suppliers are required to provide a copy of their current Modern Slavery statement annually, or if they are not required by law to maintain such a statement, to provide evidence of their modern slavery assurance practices.

On the basis of the information provided through this vendor verification process, Achieve makes determinations regarding the continued engagement of that vendor. Failure to provide adequate information with respect to these risks is escalated to the Executives responsible for modern slavery risk for review and determination of next steps. Further detail regarding these activities is contained in the case study section of this Statement.

- **Strengthening of Modern Slavery contractual and reporting obligations in all Achieve Australia contractual arrangements, with a particular focus on contractual arrangements approaching renewal.**

The Achieve legal team has sought to ensure that all new contracts and service agreements provide for robust modern slavery provisions from both a compliance and reporting perspective. The legal team have particularly focused on contractual arrangements that arise for renewal. Where contracts have not previously contemplated modern slavery compliance, this has been included as a requirement prior to any renewal to ensure contractual arrangements are strengthened in this regard.

- **Commencement of monthly legal forum, with Modern Slavery as a presentation topic to all Achieve Senior Staff.**

In September 2024, the internal Achieve legal department commenced a monthly forum, which includes a presentation on a particular topic to the Achieve Senior Staff group.

The first presentation topic was modern slavery, with the presentation utilising resources from Anti-Slavery NSW to provide the cohort of staff with an overview of modern slavery risk in Australia, the steps Achieve is taking to address this risk, how modern slavery risks may present to staff and how to report any concerns staff may have.

There was such interest in the topic of modern slavery and how we can support staff if they have concerns, that the legal team undertook a follow up presentation in February 2025.

- **Modern Slavery and ESG risk were added as a standing agenda item at Executive and Board Committees, both as a standalone agenda item and as part of the Enterprise Risk Register.**

The Risk Quality and Compliance Committee, which is an internal management committee, provides leadership and oversight of all areas of risk management in the organisation, through a review of all risk documentation. Modern slavery is a risk tabled at this Committee.

The Finance Risk Audit and Compliance Committee, which is a Board committee, has the high-level responsibility for considering the adequacy and effectiveness of the internal control and risk management framework implementation in the business, as well as considering the effectiveness of the Company's systems, policies and practices that relate to compliance with laws, regulations, internal policies and accounting standards. This Committee oversees

modern slavery risk as it is embedded in the enterprise risk register and reported on at each meeting.

- **Development and rollout of Modern Slavery E-Learning module for frontline managers and staff.**

The Achieve Learning and Development team developed internal learning modules on Modern Slavery in an Australian context.

The E-learning module was released in the last week of November 2024 across Achieve for all permanent employees to complete as part of their mandatory learning.

The learning module:

- Reinforces our commitment to prevent modern slavery within our business structure and operations.
- Reinforces our reliance on awareness as a catalyst to identify any harmful practices, should they occur.
- Has been developed to help employees understand what modern slavery is, and how they can stay vigilant against it in our workplace.

The learning module comprises of three units, being:

- Unit 1- What is modern slavery?
- Unit 2- Achieve Australia's Modern Slavery Responsibilities.
- Unit 3 - How you can help, this includes reference on who to contact if they have concerns about modern slavery in our workplace.

All new starters at Achieve are now assigned the e-learning module and information on our Modern Slavery statement is included in corporate induction.

Communication about the learning modules will be made in our internal communication channels including, Achieve in Brief and the Operational Heads-up meetings.

The learning and development team will report and monitor the completion of the learning module in the Mandatory Learning.

- **Modern Slavery and ESG added to Annual Report.**

In order to ensure transparency of Achieve Australia's approach to ESG and Modern Slavery, both have been added to our Annual Report.

MSWG Priorities for 2025/26

The MSWG have articulated the following priorities for the group's ongoing 2025/26 work plan:

- Development and implementation of a Supplier Code of Conduct, which provides for requirements pertaining to legislative compliance, with specific reference to modern slavery legislation compliance.
- Embedding of modern slavery risk management practices within the procurement tender processes.
- Continued auditing activities of high spend and/or high-risk suppliers in relation to modern slavery compliance.
- Further education for both Achieve managers and frontline staff with respect to modern slavery, both through internal legal forums and external education.
- Continued roll out of the current supplier assurance mechanism whereby suppliers provide evidence of their modern slavery assurance practices and independently validated attestations around modern slavery to all Achieve suppliers.
- Consider including Modern Slavery in the Achieve Australia internal audit program as part of a broader ESG internal audit.

Case studies

Achieve Labour Hire Audit

In November 2023, Achieve initiated a project to review and improve our processes in managing our suppliers of labour or labour hire agencies and agency staff focusing on:

- **Governance** – having a more robust procedure in the criteria for selecting suppliers of labour, service agreement, monitoring of performance or adherence, onboarding and offboarding and system access.
- **Compliance** – ensuring that our suppliers adhere to the terms and conditions of the service agreement, specifically around compliance of labour hire staff with probity checks, visa requirements, driver's licence and employment practices.
- **Competency** – ensuring labour hire staff provided by our suppliers meet the minimum competency standards and qualifications to ensure safe service delivery
- **Inclusion** – ensuring that all workers engaged by Achieve, whether it is Achieve's employees or labour hire staff deliver consistent level of service standards and care to Achieve's clients.

One of the primary functions of the project is to conduct audits on our top six labour hire agencies based on expenditure, on the above areas of focus.

The audit was conducted between January to March 2024 by visiting the respective agency offices and requesting to view relevant documentation.

The result of our first audit varied across agencies, from fully compliant to partially compliant. Some of the findings relevant to Modern Slavery pertained to employment practices.

Achieve determined that a particular agency:

- had unreasonable restraint clauses in casual employment contracts and;
- had unreasonable monetary penalty imposed in their employment contract to deter workers from leaving their employment.

Whilst these did not breach the threshold of modern slavery, Achieve conveyed to the agency that these practices were inconsistent with legislation and our expectation in relation to employment practices.

The supplier was receptive of our feedback and was unaware that their practice could potentially be in breach of employment legislation. They sought advice and made amendments to their employment contract and reissued employment contracts.

Following the initial audit, the determination was made that following the transition of all agencies to the standard Achieve service agreement, all suppliers will be audited quarterly for compliance purposes.

New Vendor Verification

In 2024, Achieve commenced work with a technology vendor to roll out a vendor verification process within the Achieve procurement process. Through implementing this vendor, all new vendors have the following information verified:

- Entity registration status.
- ABN confirmation
- Bank account and BSB confirmation.
- Conflict of interest declaration.

The technology also provides for automated communication between Achieve and our vendors to source certain information. As such, Achieve have leveraged this technology to incorporate modern slavery compliance verification through this automated process. This system also collects updated statements regarding compliance from all new and current vendors through the life of this contract.

It is the intention of Achieve to roll this technology out across multiple compliance requirements, and to roll out a Supplier Code of Conduct via this mechanism in 2025/26.

This process will be ongoing and will help build our internal capacity to ensure modern slavery compliance.

Achieve Australia Risk Framework and Continuous Improvement

Where Achieve Australia identifies potential risks of causing, contributing to, or being directly linked to a form of modern slavery, our response will be managed by through our Risk Management Framework and the following principles.

- **Risk-based due diligence:** meaning that the process of identifying and responding to modern slavery risks will reflect the applicable risk profile and operating environment, including the following:
 - a) activities undertaken in high-risk geographical areas;
 - b) purchasing goods or services considered at high risk of being linked to modern slavery;
 - c) operations in high-risk sectors; and
 - d) engagement with vulnerable populations at a heightened risk of modern slavery
- **Fit for purpose:** meaning that actions taken, and due diligence requirements imposed, will adequately address modern slavery risks whilst meeting organisational needs.
- **Balance:** meaning that actions taken and due diligence requirements:
 - a) will be commensurate with Achieve Australia's capacity and that of its subsidiaries and suppliers to implement and monitor those actions; and
 - b) will not act as a disincentive for clients and suppliers to engage with the Achieve Australia.
- **Embedded in 'business as usual':** meaning that actions to be taken and due diligence requirements will be included in Achieve Australia's existing operating model with clear roles and responsibilities, reporting requirements and management controls.

All staff, contractors, suppliers, and clients are encouraged to report and appropriately escalate concerns about possible modern slavery to their manager or support worker at the earliest possible opportunity.

Continuous Improvement

At Achieve Australia, we aim for continuous improvement in managing and addressing modern slavery risks. We are committed to improving risk management processes to identify, evaluate, mitigate, and monitor potential risk areas which could be exposed to human rights concerns including, modern slavery.

In line with this commitment, we have:

- Assessed our systems and controls to ensure our processes are aligned with our human rights obligations.
- Reviewed, assessed and enhanced the maturity of our policies and procedures to align with evolving best practice and legal requirements.
- Reviewed our remediation and grievance mechanisms to ensure consistency with the United Nations Guiding Principles on Business and Human Rights.
- Maintained a consistent practice of communication and transparency in our efforts to combat modern slavery and protect individuals with disabilities, extending to all stakeholders, including service users, employees, support workers, and the broader community.

Achieve Australia recognises the importance of ensuring our business operations and supply chain operate with the continuous improvement imperative in mind. It is an ongoing initiative, one which involves a collaborative effort to prevent modern slavery practices.

Statement of Application and Authorisation

Achieve Australia Limited operates a centralised procurement function for all associated entities. As such this report applies to all Achieve Australia Limited controlled entities.

This statement was approved by the Board of Achieve Australia Limited.

A handwritten signature in black ink, appearing to be 'Kerry Stubbs', written in a cursive style.

Signature of Board Chair – Kerry Stubbs