



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

Modern Slavery Statement

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

Reporting Period: 1 July 2022 – 30 June 2023

Link Wentworth Housing Limited
ABN 62 003 084 928



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



This Modern Slavery Statement was approved by the Board of Link Wentworth Housing Limited as the principal governing body on 14 December 2023.

Pursuant to the requirements of the Modern Slavery Act 2018 (Cth), the contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person.

This statement is signed by Michael Allen, PSM in his role as Chair of the Board, Link Wentworth Housing Limited on 14 December 2023.

14 December 2023

Signature

Date

Chair, Link Wentworth Housing Ltd Board

Position

Table of Contents

| | |
|--|----|
| Reporting Requirement #1: The Reporting Entity | 02 |
| Reporting Requirement #2: Structure, Operations, and Supply Chains | 03 |
| Reporting Requirement #3: Identifying and Assessing Potential Modern Slavery Risk | 06 |
| Reporting Requirement #4: Addressing Modern Slavery Risks | 08 |
| Reporting Requirement #5: Measuring Effectiveness | 10 |
| Reporting Requirements #6 & 7: Consultation with Owned Entities and Other Information | 13 |

Reporting Requirement #1

The Reporting Entity

The reporting entity covered by this modern slavery statement is Link Wentworth Housing Limited - ABN 62 003 084 928 (referred to in this Statement as "Link Wentworth", "we" and "our").

This is only our second year as a reporting entity and covers the 2022-2023 Australian financial year.

Our purpose is to provide more homes and deliver quality services to enable a brighter future for people facing housing stress and homelessness.

We wholeheartedly believe that housing is a human right—that a roof above your head provides a person with not just safety but purpose, belonging and dignity.

We strive to achieve this purpose, underpinned by the following key values:



Customer-focus

Our customers are at the heart of everything we do.



Compassion

We genuinely care for each other and everyone we work with.



Integrity

We are committed to safety, honesty, and accountability.



Respect

We value everyone we engage with and treat them fairly and equitably.



Ambition

We have the courage to lead and help drive positive social change.

Reporting Requirement #2

Structure, operations, and supply chains

Structure

Our corporate structure remains as previously described in our last statement. LinkWentworth is:

- » A public company, limited by guarantee;
- » Registered with the Australian Charities and Not-For-Profits Commission;
- » One of Australia's largest registered Tier 1 Not-For-Profit Community Housing Providers; and
- » Approved under the National Regulatory System for Community Housing.

LinkWentworth's principal governing body is its Board of Directors.

LinkWentworth does not own or control any other entities.

Operations

Our core operations have not changed since our inaugural statement in the last reporting period, as per our previous description.



Housing Services

We work with developers, government, private and institutional investors to build more dwellings, adding to the social and affordable housing supply in the country.

We currently own or manage

6,400 properties

and have a pipeline to build close to

300 new homes

over the next three years.

LinkWentworth provides a range of housing products and services for people on low to moderate incomes, as well as those living with a disability. We also provide wraparound services to give our clients support to access housing, sustain their tenancies and build brighter futures.

Our range of housing options and services include:

- » Social housing
- » Affordable housing
- » Disability housing
- » Meanwhile Use housing
- » Specialist Homelessness Services
- » Together Home (helping people who are street sleeping)
- » Private Rental Assistance
- » Rent Choice Start Safely
- » Community building



Charitable activities

Link Wentworth also engages in a range of charitable activities which align with our ethos of building strong communities through social and advocacy initiatives.

Our primary charitable initiatives include:

» Scholarship Program

Provided over \$500,000 in scholarship funds since 2011.

» Ready2Work Program

In partnership with Darcy Street social enterprise, which trains social housing residents with hospitality skills, empowering them to find permanent employment within the sector.

» Work Rent Incentive Scheme

Supports young people living in our transitional housing with stable job opportunities and promotes financial saving education to assist them with finding stable housing for the future.

The following snapshot outlines some highlights in relation to our core operations for the reporting period:

6,392 properties

under Link Wentworth management

Over 10,000 residents

in our properties

532 clients assisted

through our homelessness services

99%

occupancy rate

112 clients assisted

through the Nurreen Domestic Violence Service

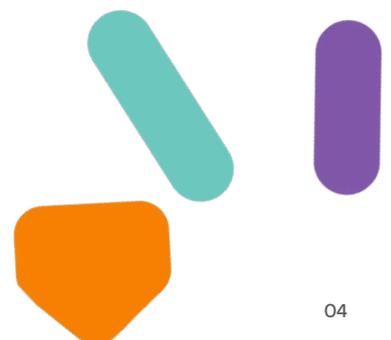
- » Opening a new four-unit, short-term supported accommodation service in the Hawkesbury Local Government Area for women and their children escaping family and domestic violence. It provides both comfortable and safe accommodation, as well as a common area where local community organisations can offer services and support.
- » We were awarded a \$6,010,000 grant from NSW Land and Housing Corporation (LAHC) to upgrade 258 government-owned social housing properties that we manage.

A range of additional projects are underway which will contribute to Link Wentworth delivering 350 new social and affordable dwellings over the next three years at a total development cost of \$200 million.

These include:

- » **33 Social and affordable units in Rouse Hill**
- » **8 Social homes for young people in Penrith, in partnership with Platform Youth Services**
- » **11 Social homes for seniors in Pennant Hills**
- » **12 Social and affordable units in Cammeray, in partnership with North Sydney Council**
- » **135 Social and affordable homes at Lachlan's Line, in partnership with Landcom**

We continue to operate across 28 Local Government Areas across New South Wales. Our offices are in Chatswood, West Ryde, Penrith, Windsor, Katoomba and Lithgow.



Our team

Link Wentworth employed a total of

222 people

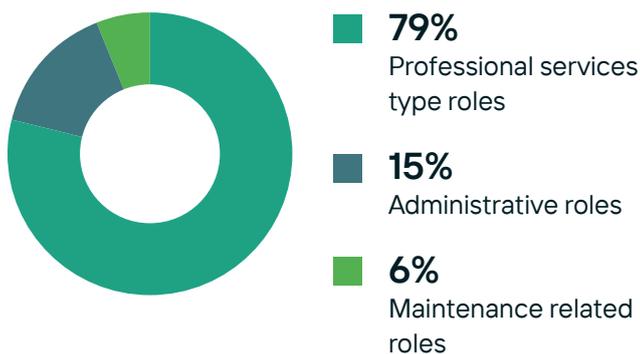
during the reporting period.

Only one staff member was employed on a casual basis. At the conclusion of the reporting period, we also had one temporary staff member who was engaged through an employment agency.

We also engaged with a small number of independent contractors. Our overall workforce increased slightly (from 212) in the previous reporting period.

Link Wentworth pays our contractors sourced through employment agencies the same base salaries as equivalent employee positions.

A further breakdown of the roles in our workforce for the FY22-23 reporting period is set out below:



Our supply chains

Link Wentworth engaged in direct (first-tier) supplier relationships with 1,097 unique entities during the reporting period.

Whilst, on the face of it, this represents a decrease in overall direct supplier numbers from our first reporting period, we primarily attribute this to significant improvements in our procurement monitoring and classification systems, such that (potentially indirect) supplier engagement via internal steps such as staff reimbursement are now more accurately characterised.

Key suppliers that support our housing and community operations include:

- » Cleaning services
- » Utilities providers
- » Repairs and maintenance services
- » Construction services
- » Motor vehicle services
- » Landlords Council services
- » Furniture suppliers
- » Storage and removal services
- » Real estate providers

Our business functions continue to be supported by suppliers operating in the following industry categories, consistent with the descriptions provided in our last statement:

- » 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

The only international supplier with which we directly engaged was a single real estate services provider based in the UK. The remainder of our direct suppliers are Australian companies or Australian subsidiaries of major global conglomerates.

Reporting Requirement #3

Identifying and Assessing Potential Modern Slavery Risk

Supply chains

In line with a continuous improvement approach to our developing modern slavery response, for the first time Link Wentworth has identified and assessed areas of potentially elevated risks in our supply chains by utilising the proprietary technology and methodology of external subject matter experts. Our complete procurement spend data for the reporting period was analysed for this risk assessment.

For this reporting period, the risk assessment identified suppliers in the following industry categories as having the most elevated (in relative terms within our supply chains) areas of potential risk.

We have also included a brief description of key industry characteristics, including why these categories can be associated with potentially elevated risk.



Australian Construction work and related services

This category includes Link Wentworth's new housing construction projects. It also covers repairs and maintenance suppliers used for the full range of existing housing facilities which we manage or are otherwise associated with.

Link Wentworth relies on various repair and maintenance suppliers. Many of the companies that we engage are smaller entities or sole traders with limited awareness of modern slavery and related risks.

Potentially elevated risks (including within Australia) for these sectors are attributable to characteristics such as informal worker payment arrangements, relatively low barriers to entry for unskilled migrant workers, routine use of labour hire agents, and prevailing employment practices such as subcontracting arrangements with relatively low transparency.

The Walk Free Foundation's Updated 2023 Global Slavery Index identifies the construction industry as one of the predominant sectors of forced labour within Australia.¹

Deeper-tiered supply chain risks relating to building, construction and maintenance activities can also arise in connection with the extraction of raw materials used for common building materials, tools (especially cordless products powered by lithium batteries) and machinery, including common metals (iron, steel, and aluminium), timber products, bricks, concrete / cement, and PVC.

¹ <https://www.walkfree.org/global-slavery-index/country-studies/australia/>; original footnotes excluded.



Australian Business services

This category includes professional service providers, such as consulting firms, accounting, advisory, legal, and engineering firms.

The potentially elevated areas of risk associated with the profession services included in this category do not relate to the operations of Link Wentworth's direct suppliers. Rather, risks lie predominantly with deep-tiered supply chain characteristics associated with the dominant use of computers, digital devices, software, and other electronics products. The 2023 Global Slavery Index describes electronics as the highest risk product imported into Australia.²

Identified risks exist through the manufacturing and assembly aspects of the supply chain, which is typically occurs in high-risk countries including Malaysia and China. Elevated risks are present at the raw material extraction phase, including for key component minerals such as cobalt, lithium and gold.



Australian Textiles

This category includes our staff uniform provider.

Global garment manufacturing is the most widely recognised at-risk sector for modern slavery, from harvesting cotton to manufacturing textiles.

Farms and factories are typically located in high-risk countries including China and India.

The universal prevalence of migrant workers in apparel industries, along with typically low skilled positions, and lacking overall supply chain transparency all contribute to the globally elevated risk.

Operations

Given our solely Australian-based operations, substantial protections for our entire workforce, and the industry sector to which we belong, we consider our operational risks to remain very low.

Nonetheless, we recognise that our direct connection with the Australian construction industry is a particular feature of our core operations that requires active steps to mitigate and address supply chain issues on an ongoing basis across reporting periods.



² <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

Reporting Requirement #4

Addressing Modern Slavery Risks

Link Wentworth did not receive any reports, or otherwise become aware, of any actual or suspected incidences of modern slavery practices of any kind in its operations or supply chains during the reporting period.

Focus Areas and Initiatives

The following is an overview of initiatives that we implemented over the reporting period, and also describes our ongoing focus areas for the immediate future as part of our longer-term efforts to address risk in areas where the greatest practical impact can be achieved.

Key supplier engagement

During reporting period, Link Wentworth engaged with its major suppliers (by overall spend) in the areas of building repairs and maintenance, and IT / corporate services.

The process was primarily intended to provide us with a baseline understanding of how developed our key suppliers' own modern slavery response frameworks are including the nature and extent of:

- » Modern slavery related policies and requirements in its supplier contracts
- » Assignment of internal responsibility for the day-to-day management of modern slavery risks
- » Modern slavery supply chain risk assessment
- » Training on identifying, assessing, and responding to modern slavery risks.

Whilst there was a demonstrated level of basic awareness (and in some cases governance structures) relating to relevant modern slavery issues, the key suppliers who are not reporting entities under the Act generally appeared to be at a very early stage in their formal approach to modern slavery, particular in relation to supply chain considerations.

More positively, we were impressed by the genuine willingness for engaged suppliers to potentially partner with Link Wentworth on collaborative modern slavery initiatives in the future.

Internal training, education, and capacity building

As this is only our second year as a reporting entity under the Act, we recognise that there is still a need for significant awareness raising within Link Wentworth in relation to potentially relevant areas of modern slavery risk in our supply chains and operations, and the best way of responding to such risk. Consequently, internal training was an important focus area for the reporting period.

Key initiatives of this kind included targeted activities for our Board members, procurement team members, and general staff training.

Board training

A training module was delivered to all Directors developed by the Australian Institute of Company Directors. All Directors completed the training.



Procurement training

In February 2023, a training session was delivered to all our procurement staff. This training was developed in house by our Chief Communications Officer and covered the following key areas:

- » Overview of what modern slavery is, including the types of exploitation that fall within the legal definition of modern slavery and what main practices fall within its scope.
- » Explanation of the prevalence of modern slavery practices in Australia.
- » Overview of statistics regarding modern slavery prevalence globally, and in Australia / New Zealand.
- » Explanation of the Modern Slavery Act including the mandatory reporting requirements.
- » Summary of the inaugural modern slavery statement submitted by Link Wentworth, including the risks identified and early steps taken by the organization.
- » In depth overview of the action plan developed for our second and third reporting periods (see further description below).

A summary of this training session was also presented to all staff at our all staff monthly meeting in June 2023, including highlighting our multi-year action plan.

General staff wide training

Towards the end of the reporting period, all staff received an online training module developed by a third-party provider.

Link Wentworth's multi-year Modern Slavery Action Plan

Due to wider organisational pressures and priorities, including an unprecedented affordable housing crisis in the Greater Sydney Metropolitan area and future major developments that Link Wentworth is spearheading to respond to this crisis, it became clear to us during the reporting period that we needed to carefully re-evaluate the feasibility of timelines for proposed commitments that were mainly set out in the "measuring effectiveness" table in our inaugural modern slavery statement last year.

A key outcome of this self-assessment process was our creation of a multi-year 'action plan' to allocate specific planned actions across this and the next reporting period.

To ensure effective oversight and progress tracking, each planned action was assigned to an executive team member and other staff who are responsible for taking 'ownership' over each action. This Plan has been widely circulated and implementation of the specific measures it outlines is well underway.

Gap Analysis of Link Wentworth's Policy and Governance Framework

We carried out an internal gap analysis of our existing policy and governance framework, with updated policies scheduled for approval in the next reporting period.

As a result of this process, it is anticipated that there will be substantive updates and additions to the following internal policies:

- » Investment Policy
- » Recruitment & Selection Policy
- » Purchasing Policy
- » Maintenance Contractor Engagement Management and WHS Policy



Reporting Requirement #5

Measuring Effectiveness

During the reporting period, one of the key metrics we used to monitor the progress and effectiveness of our still developing modern slavery response, was our Action Plan for the 2022/2023 and 2023/2024 financial years.

(As described above on page 9).

As this is a multi-year plan and we are only part way through the period that it covers, many of foreshadowed actions are partially complete or underway.

Whilst we have made significant progress, particularly in the areas of comprehensive supply chain risk assessment, targeted internal training and capacity building, and further developing our governance framework to address modern slavery issues more specifically, we recognise that it has been practically beyond our reach to achieve all that we had previously indicated as planned for this reporting period.

As a not-for-profit, for-purpose organisation with a primary focus on the provision of affordable and appropriate housing for at-risk individuals in Australian communities, the reporting period was marked by a significant increase in overall organisational workload attributable to several major projects being undertaken, including a major project to provide:

350

new affordable dwellings over the next

3 years.

Combined with the pressure and practical imperatives created by the unprecedented housing availability crisis in the Greater Sydney area, which we view as a first order priority, an essential triaging of resource allocation and staff capacity to undertake non-core activities within our organisation has been required.



The following Table provides an overview of progress, including identification of priority areas that we will use in measuring our effectiveness into the next reporting period:

| Core Aspect of Modern Slavery Response | Action area indicator for FY2022/23 and FY2023/24 reporting periods | Progress update |
|--|---|--|
|  Risk assessment | Continued supply chain mapping and targeted risk assessment of our supply chains and operations. | Completed. Engaged external subject matter experts for comprehensive supply chain risk assessment of our entire procurement spend for the reporting period. |
|  Supplier Engagement and Due Diligence | Issue supplier self-assessment questionnaires and training modules to higher risk suppliers. Undertake further due diligence on high-risk suppliers. | Partially completed and in progress. Engagement with key suppliers in the repairs and maintenance category. |
| | Developing and embedding modern slavery provisions into supplier contracts. | Not yet completed. Scheduled for next reporting period under the action plan that we have developed. |
| | Developing modern slavery procurement assessment framework to inform purchasing decisions. | Not yet completed. Scheduled for next reporting period under the action plan that we have developed. |
|  Internal Governance and Policy Frameworks | Undertake policy review and gap analysis. Update key governance documents and policies with modern slavery related provisions. | Partially completed and in progress. Policy review of following documents was completed, with updated policies scheduled for approval in the next reporting period: <ul style="list-style-type: none"> » Investment Policy » Recruitment & Selection Policy » Purchasing Policy » Maintenance Contractor Engagement Management and WHS Policy » Recruitment & Selection Policy |
| | Develop modern slavery roadmap for long-term strategy. | Partially completed and in progress. Initial modern slavery action plan for this and next (FY2023/24) reporting period completed and implemented, including organisational training. Longer term roadmaps for our modern slavery response to be undertaken in the next reporting period. |

Core Aspect of Modern Slavery Response

Action area indicator for FY2022/23 and FY2023/24 reporting periods

Progress update



Modern slavery training

Provide ongoing training for suppliers and internal employees.

Partially completed. Training provided for all staff in the form of short training in all staff meeting, and online training modules.

Specific training provided for procurement team.

Facilitate tailored training for our Board.

Completed.

All of our Directors have completed modern slavery training module developed by the Australian Institute of Company Directors.



Grievance procedures and empowering worker voices

Review our Employee Complaints & Grievance Procedures and Complaints and Feedback Policy to include modern slavery provisions.

Not yet completed.

Scheduled for next reporting period under the action plan that we have developed



Remediation

Develop formal remediation framework.

Not yet completed.

Scheduled for next reporting period under the action plan that we have developed.



Reporting Requirement #6 & 7

Consultation with Owned Entities and Other Information

As noted above in relation to our structure, Link Wentworth does not own or control any other entities.





**Link
Wentworth**

Providing homes, building futures.

Link Wentworth Housing Limited
ABN 62 003 084 928