

MODERN SLAVERY STATEMENT

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What is Modern Slavery?

Modern slavery is the severe exploitation of other people for personal or commercial gain. Modern slavery is all around us, but often just out of sight. People can become entrapped making our clothes, serving our food, picking our crops, working in factories, or working in houses as cooks, cleaners or nannies.

From the outside, it can look like a normal job but people are being controlled – they can face violence or threats, be forced into inescapable debt, or have had their passport taken away and are being threatened with deportation. Many have fallen into this oppressive trap simply because they were trying to escape poverty or insecurity, improve their lives and support their families.

The United Nations and the Walk Free Foundation estimate 40 million people are estimated to be trapped in modern slavery worldwide:

- 1 in 4 of them are children
- 16 million are exploited in private sector supply chains
- Almost three quarters (71%) are women and girls
- Modern slavery can occur in every industry and sector
- 4 out of 5 modern slavery victims in Australia go undetected

Multicap Limited does not tolerate slavery, human trafficking and this first Modern Slavery Statement describes our commitment to preventing modern slavery in our operations and supply chains.

The Modern Slavery Act 2018 established Australia's national reporting requirements. In accordance with the Act Multicap is required to report annually on the actions taken in the preceding year to minimise Modern Slavery across our operations and supply chain.

About Us

Multicap's sole purpose is to enhance the quality of life of people with disabilities and their families. Multicap was established in 1962 by five families seeking support for their children with complex disabilities. Multicap has evolved into an organisation with a broad service offering. From our Community Hubs where customers socialise with friends and engage in activities; to our supported and assisted employment and training opportunities where customers can increase their confidence and independence.

Our bespoke housing services often facilitate a young person's first move out of the family home. For others, it offers independence and freedom with support to meet their unique needs through any phase of life. Customers can explore and discover their creative potential through our Music Therapy and Centre of Creative Arts programs, empowering them to unlock a whole world of new opportunity. Multicap is an industry leader in Specialist Critical Supports and Positive Behaviour Support services, working with customers and their support networks to find strategies and solutions to assist people with complex needs to increase their quality of life.

We are committed to being here for our customers in all ways, always.

Our Organisation

Multicap Limited is a not for profit organisation, incorporated as a public company limited by guarantee and domiciled in Australia.

This Modern Slavery Statement (Statement) is published on behalf of Multicap Limited.

Multicap had an annual consolidated gross revenue of \$103,313,149 for the 30 June 2021 financial year. Multicap recently merged with Open Minds Australia Limited which has been established as a subsidiary entity of Multicap Limited on 7 October 2021 and established two new subsidiary entities, Allinto and Arbourwell in November 2021. This Statement reflects Multicap Limited as at 30 June 2021 prior to the establishment of the subsidiary entities.

Our Services

Multicap is a disability services provider that provides a range of services for approximately 1,449 people in Queensland and northern New South Wales including:

- Supported independent living services
- Short term accommodation services
- Community services
- Daily living skill services
- NDIS support co-ordination
- Supported employment including commercial laundry services, packaging and assembly business
- School holiday programs

Our Governance

Multicap is established as a company limited by guarantee and is a charity registered with the Australian Charities and Not-for-profits Commission (ACNC), operating within the regulatory framework and other guidance provided by the ACNC. The Multicap Board is responsible for ensuring that there is a good governance framework in place across Multicap. The Multicap Governance Policy (available at www.multicap.org.au/our-policies) sets out the key statements which contribute to this framework.

The Board is ultimately responsible for ensuring that Multicap achieves its objectives ethically, responsibly and within its legislative and regulatory obligations and is assisted by four Board Committees:

- Finance & Audit Committee
- Strategy & Business Improvement Committee
- Risk & Quality Committee
- Remuneration and Nominations Committee

Accordingly, the Board is accountable to members of the company for the attainment of Multicap's vision and purpose, and for ensuring the ongoing sustainability of the organisation.

Our Executive Leadership Team includes the CEO and executives accountable for Service Delivery, People and Culture, Risk and Quality, Clinical and Practice Excellence, Commercial Services, Information and Communication Technology, Marketing and Customer Experiences.

Our Values and Code of Conduct

All Directors, Executives, and employees are required to meet the standards outlined in Multicap's Code of Conduct. Multicap's four values describe what we stand for:

- always empowering
- · always respecting
- · always connecting
- always creating.

These values are embedded in our Code of Conduct which guides the behaviour and actions we expect all our employees and representatives to practice.

Policies

Our Policies cover the key elements of how we work. They are regularly reviewed to ensure alignment with regulatory requirements, strategic direction and best practice. As part of this review process Multicap will clarify its approach to modern slavery and upholding of people's human rights. We will also develop our Procurement Framework, outlining our process to assess prospective suppliers and their supply chains for modern slavery risks.

Multicap's Risks of Modern Slavery

Multicap has commenced a review of supply chains and procurement practices across Multicap's portfolio of businesses. We have identified approximately 750 current suppliers in our supply chain with an annual spend of \$8M (excluding GST). The location of our suppliers' were identified as 70% Queensland, 25% other parts of Australia and 5% international.

Our supply chain categories include:

- property management including maintenance and utilities;
- Information and communications technology;
- cleaning services;
- clinical and therapeutic goods;
- pharmacy supplies;
- allied health and other professional services;
- temporary staff agencies;
- fleet management services;
- furniture;
- marketing; and
- general office administration goods and services.

Our largest categories of spend include information and communications technology, clinical and therapeutic goods including personal protective equipment, temporary labour hire, cleaning and property management including maintenance and utilities. Modern Slavery

risks which Multicap may potentially be exposed to through its operations include supply chains relating to cleaning, property maintenance or construction contractors and consumable goods and electronics produced overseas. We are committed to enhancing our modern slavery risk identification, mitigation and controls over the next 12 months.

Our Actions

During 2021, Multicap commenced reviewing our risk frameworks, policies and procedures to reduce the risk of human rights violations in our business operations and supply chains through:

- Undertaking an initial review of our supply chain across Multicap's businesses
- Conducting an analysis of the risk in our supply chain following the initial supply chain review
- Preparing an action plan to monitor the progress of our plans to strengthen our response to Modern Slavery risks across Multicap
- Developing our initial Modern Slavery Statement

Our Plans

Multicap has adopted a continuous improvement approach to modern slavery risks and will continue to strengthen our understanding of human rights issues as they apply to our organisations. Our key areas of focus are to:

- Review our Policies to ensure our commitment to human rights and the elimination of modern slavery practices is clearly articulated.
- Further analyse the risk in our supply chain across Tier one and Tier two suppliers
- Establish a procurement framework that incorporates a risk-based assessment of suppliers, a statement of our commitment to the elimination of modern slavery to current and future suppliers, a supplier code of conduct, contractor onboarding and review our terms of engagement of contractors and terms and conditions of purchase of goods and services to incorporate our expectations regarding modern slavery.
- Focus on improving awareness by developing and activating human rights and modern slavery awareness training for relevant Multicap employees involved in managing associated risks.
- Conduct an initial review of employment processes and agreements for recruitment of higher risk employee cohorts to identify and mitigate risk of modern slavery.

We will continue to identify other actions which would be effective in the assessment and elimination of modern slavery risks associated with our operations.

Effectiveness of our actions

To assist in monitoring the effectiveness of our actions across Multicap and all subsidiary entities, we will:

- Review the action plan regularly as part of our corporate risk and assurance management review processes.
- Develop a category management framework and resource appropriately to support the supply chain uplift.
- Evaluate Supplier risk assessments targeting higher risk categories.
- Establish and monitor key performance indicators to measure the effectiveness of our supply chain uplift.

Consultation

Multicap will partner with our suppliers to enhance our understanding of the modern slavery risks within their supply chains and support their due diligence in evidencing their management of those risks.

Monitoring of the progress of activities to mitigate the risks of Modern Slavery will be undertaken by Multicap's Risk and Quality Committee on a quarterly basis, reflecting a continuous improvement approach. Key internal stakeholders and the Multicap Board were consulted during the development of this Statement.

This Statement was endorsed by the Multicap Board on 8 December 2021

Angela Tillmanns

Multicap Limited Chair

25 January 2022