

Multicap Group

Modern Slavery Statement

(Second Edition December 2022)

Modern Slavery Statement

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Modern Slavery Statement

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 Global Estimates of Modern Slavery: Forced Labour and Forced Marriage Report 2022 (International Labour Organization (ILO), Walk Free, and International Organization for Migration) **estimated that 50 million people are estimated to be trapped in modern slavery worldwide:**

- 12% of them are children
- 16 million are exploited in private sector supply chains
- 4 out of 5 modern slavery victims are women and girls trapped in forced commercial sexual exploitation.
- Modern slavery can occur in every industry and sector

Multicap Group does not tolerate slavery or human trafficking. This second Modern Slavery Statement describes our ongoing 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 Group is required to report annually on the actions taken in the preceding year to minimise Modern Slavery across our operations and supply chains.

About Us

Multicap Group's purpose is to enhance the quality of life of people with disabilities and their families. The parent entity, Multicap Limited was established in 1962 by five families seeking support for their children with complex disabilities. Over the 2022FY Multicap evolved into a group of not-for-profit companies that collectively deliver a broad service offering to persons with a disability and persons with mental health or psychosocial disabilities. Multicap Group spans multiple Australian States. Our services range from NDIS support coordination; to 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; to youth and adult community mental health services, clinical mental health services and psychosocial disability supports, and more.

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. Our Music Therapy and Centre of Creative Arts programs encourage individuals to discover their creative potential by empowering them to unlock a whole world of new opportunities. 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.

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

Our Organisation

Multicap Limited published its first Modern Slavery statement for the 2021FY, as a single entity, being Multicap Limited. Multicap publishes this second edition Modern Slavery Statement as Multicap Group, which includes Multicap Limited (ABN: 40 120 240 686), Open Minds Australia Limited (ABN 19 009 687 030), Allinto Australia Limited (ABN 84 655 217 691), Arbourwell Limited (ABN 48 655 217 913).

All entities within Multicap Group are not-for-profit organisations, incorporated as public companies limited by guarantee and domiciled in Australia. All entities are registered charities with the Australian Charities and Not-for-Profits Commission.

Multicap had an annual consolidated gross revenue of \$150 million for the 30 June 2022 financial year.

Our Services

Multicap Group is a disability and mental health services provider that provides a range of services for people in Queensland, northern New South Wales and Victoria 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;
- Youth and adult community mental health services;
- Clinical mental health services;
- Psychosocial disability supports.

Our Governance

Multicap Group operates within the regulatory and compliance framework of the Charities and Not-for-Profits Commission. Each entity has its own governing Board, with the Multicap Limited Board overseeing the governance framework for Multicap Group. The Multicap Governance Policy (available at www.multicap.org.au/our-policies) sets out the key statements which contribute to this framework.

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

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

The Board of Multicap Limited 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. The Multicap Group Executive Leadership Team includes the CEO and Executives accountable for Service Delivery, People and Culture, Practice and Quality, Clinical and Practice Excellence, Operations and Commercial Services, Information and Communication Technology, Marketing and Customer Experiences, Legal and Corporate Governance.

Our Values and Code of Conduct

All Directors, Executives, and employees are required to meet the standards outlined in Multicap Group's Code of Conduct that is underpinned by four values

- 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 are regularly reviewed to ensure alignment with organisational governance, 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 are progressing the development of our Procurement Framework, outlining our process to assess prospective suppliers and their supply chains for modern slavery risks.

Multicap Group's Risks of Modern Slavery

Multicap Group's review of supply chains and procurement practices across Multicap's portfolio of businesses 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:

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- 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. The risk associated with labour hire related to disability support workers and allied health professionals has been identified as low for example due to the regulatory requirements of industrial relations laws and use of contracted agencies with relevant requirements.

Modern Slavery risks which Multicap Group 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 continue to be committed to enhancing our modern slavery risk identification, mitigation and controls as a critical part of our business practices.

Our Actions

During 2022FY, Multicap Group continued its review of risk frameworks, policies and procedures to reduce the risk of human rights violations in business operations and supply chains. This past year Multicap Group:

- Conducted an initial review of employment processes and agreements for recruitment of higher risk employee cohorts to identify and mitigate risk of modern slavery.
- Completed an initial review of supply chains across Multicap's businesses and expanded the review of supply chains across Multicap Group's businesses and associated risks with a focus on changes following acquisitions and mergers.
- Has held meetings of senior leaders and relevant staff to identify, discuss and adequately mitigate instances that could give rise to heightened risks of modern slavery, such as engaging services from overseas based contractors.

Our Plans

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

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- Continue to review our Policies to ensure our commitment to human rights and the elimination of modern slavery practices is clearly articulated.
- Continue to analyse the risk in our supply chain across Tier One and Tier Two suppliers in response to organisational growth and diversity of service provision and associated supply chains.
- Progress the 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.
- Promote awareness for relevant employees involved in managing associated risks by developing and activating internal human rights and modern slavery awareness training.

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 quarterly 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 Group will continue to 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.

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Endorsement

This Statement was endorsed by the Board of Multicap Limited on behalf of Multicap Group on 9 December 2022.



Angela Tillmanns

Multicap Limited Chair

13 December 2022