

Modern Slavery Statement

For Year Ending 31 December 2025



OCTEC LIMITED

Introduction

OCTEC Limited is a community business providing employment, education, training and advocacy services in NSW, ACT, Victoria and Queensland.

OCTEC Limited is committed to upholding human rights and acting with integrity for our people, clients, and the wider community. This includes a commitment to identifying, assessing, and addressing the risks of modern slavery practices in our operations and supply chains.

We recognise that modern slavery—including forced labour, debt bondage, child labour, and human trafficking—represents a serious violation of fundamental human rights. We adopt a **zero-tolerance approach** to modern slavery and expect the same high standards from our employees, suppliers, and partners.

During the reporting period, OCTEC continued to strengthen its approach by improving risk identification processes, increasing supplier engagement, and enhancing internal awareness and training initiatives.

OCTEC's Modern Slavery Statement addresses the seven mandatory criteria required under the Modern Slavery Act 2018:

1. identify the reporting entity
2. describe the reporting entity's structure, operations and supply chains
3. describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
4. describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
5. describe how the reporting entity assesses the effectiveness of these actions
6. describe the process of consultation with any entities the reporting entity owns or controls, and
7. provide any other relevant information.

Reporting Entity (Criterion 1)

OCTEC Limited, ACN 147 511 215 and ABN 91336868595, is the reporting entity covered by this Modern Slavery Statement.

Structure, Operations and Supply Chains (Criterion 2)

Structure

OCTEC Limited is an Australian Public Company trading as OCTEC Limited, with a head office at 247 Anson Street Orange NSW 2800. At the end of the reporting period, OCTEC had a workforce of approximately 180 employees.

OCTEC is governed by a Board of Directors as a company limited by guarantee under the Corporations Act 2001 and Australian Charities and Not-for-profits Commission Act 2012.

OCTEC's CEO reports to the Board and leads a Senior Management Team responsible for the delivery of all OCTEC programs and services.

OCTEC maintains governance arrangements that support oversight of modern slavery risks:

- The Board of Directors is responsible for governance and oversight, including ensuring that modern slavery risks are considered as part of organisational risk management.
- The CEO, supported by the Senior Management Team, is responsible for operational implementation.
- Internal functions (such as Corporate Services and procurement) play a key role in managing supplier risk and compliance.

This governance model reinforces accountability, transparency, and continuous improvement in addressing modern slavery risks.

OCTEC is not part of a larger corporate group of entities and does not control or own other entities. Huntley Berry Farm is an OCTEC-registered Business Name that we use for branding of our Australian Disability Enterprise.

Operations

OCTEC Limited commenced operations in 1976 and now has 50 service locations across the Eastern States and the Australian Capital Territory.

OCTEC's Mission is: Providing individuals with training and employment opportunities, assisting industry to recruit and develop skilled workforces, and contributing to communities becoming more sustainable.

OCTEC delivers a wide range of programs and services:

Employment Services – Inclusive Employment Australia, Capacity Pathways, Disability Employment Services, Transition to Work youth employment services, Savvy Parents pre-employment services, Jobs Victoria employment mentoring services, Mental Health Employment Strategy.

Training Services – Business and Service Industries, Community Services and Health including Aged Care, Disability Services and Home and Community Care, Retail, Supply Chain and Training for Regional Councils.

Community Development – Huntley Berry Farm (an Australian Disability Enterprise), OCTEC NDIS services, National Panel of Assessors services, Technology Services and Goldie College support services.

Our services are made available to all clients (and potential clients) regardless of race, gender, age, marital status, physical or intellectual impairment, or sexual orientation. OCTEC fully supports relevant anti-discrimination legislation and treats every client fairly and without discrimination. OCTEC staff are made aware of their access and equity responsibilities and of the importance of flexibility in delivery to cater for people with differing needs.

OCTEC staff are expected to deliver the organisation's services and to perform their specific duties in a manner that is consistent with the values of the organisation. These are:

Quality Service Provision – We are committed to the pursuit of excellence and aim to provide a high-quality service to all the clients and communities we work with.

Financial Sustainability and Flexibility – We conduct our operations with a constant focus on financial viability, both short-term and long-term, to ensure that we can continue to deliver the many services we provide. We also remain flexible and open to business opportunities as they arise, so that we can grow the organisation and continue to deliver a wide range of services that are responsive to community needs.

Community Based – While operating in a professional, business-like manner, we maintain an awareness of our community origins, have a strong emphasis on localised service provision, and encourage staff involvement in local community groups, activities and events.

Ethical and Honest – We expect our staff to always perform their duties in an ethical and honest manner.

Caring – We care for our staff as individuals with needs and responsibilities that go beyond the workplace, and in turn, we expect our staff to provide our services in a caring manner – individualised, empathic, compassionate and outcome-focused.

Child Safe - We are committed to the protection, safety and wellbeing of the children and young people who participate in our programs.

Committed – We expect staff to demonstrate a commitment to their work and to the organisation that goes beyond it being 'just a job'. In turn, OCTEC is committed to supporting staff members to grow, develop, progress and experience high levels of job satisfaction.

Professional – We expect staff to perform their duties in a professional manner, built on the foundations of caring, committed, ethical and honest behaviour.

Environmentally Sustainable – We adopt and maintain practices that reduce the generation of waste, lower energy consumption and encourage the use of recycled materials.

Supply Chains

OCTEC maintains a large and diverse supply base primarily located in Australia. While most direct suppliers operate in low-risk jurisdictions, we recognise that modern slavery risks may exist in:

- **Second- and third-tier suppliers**, where visibility is limited
- Global supply chains supporting IT hardware, uniforms, and consumables
- Sectors involving outsourced manufacturing or labour-intensive production

Additionally, some procurement categories (e.g., IT hardware, textiles, consumables and facilities services such as cleaning and maintenance) are recognised as higher-risk industries globally.

The goods and services that OCTEC purchases are in five main categories. These are:

Office Operations – office rental, IT hardware and software, telecommunications, stationary, cleaning and office supplies, insurance, work uniforms, accommodation, airfares, catering and hospitality, website hosting, graphic design, printing, promotional merchandise.

Vehicle Fleet – cars, fuel, servicing, registration, insurance.

Client Support – training courses, work clothing, personal protective equipment, tools, on-the-job mentoring and support, medical services, allied health services, counselling, fuel, motor vehicle servicing, registration, repairs, insurance, scooters, bicycles, public transport, relocation services, housing, groceries.

Farm Operations and Supplies – farm equipment and machinery purchase and rental, repairs, irrigation equipment, plants and seedlings, fertilizer, herbicides, tree removal.

Jam and Other Product Production – frozen fruit, sugar, lemon juice, oil, honey, bottles, labels, kitchen equipment.

OCTEC adopts a risk-based approach to suppliers providing products and services directly related to the provision of government contracted services. This includes Information technology hardware and software, and services attached to or used to deliver services. The risk

assessment is based on ISO27001 controls, with suppliers that are deemed medium risk requiring mitigation, and those deemed high risk being excluded as suppliers.

The nature, scale and composition of OCTEC's operations and supply chains, including the diversity of suppliers and the presence of lower-tier supply chain relationships, inform the assessment of modern slavery risks outlined in Criterion 3.

Risks of Modern Slavery Practices in Operations and Supply Chains (Criterion 3)

OCTEC has assessed the risks of modern slavery practices in its operations and supply chains, including the risks that OCTEC may **cause, contribute to, or be directly linked to modern slavery practices**, in accordance with the requirements of section 16(1)(c) of the *Modern Slavery Act 2018 (Cth)*.

OCTEC considers the risk of modern slavery within its **direct operations** to be low. OCTEC operates entirely within Australia, where strong regulatory frameworks, workplace protections and enforcement mechanisms are in place. Employees are engaged under Australian employment laws and industrial instruments, and OCTEC has policies and practices in place that promote lawful and ethical conduct.

However, OCTEC recognises that the absence of identified issues does not equate to the absence of risk, and that modern slavery risks may arise through **supply chain relationships**, particularly where there is reduced visibility or influence.

Risk Identification Approach

OCTEC has assessed the risk of modern slavery practices across its operations and supply chains using a structured risk assessment approach considering:

- **Sector and industry risks**
- **Product and service risks**
- **Geographic risks**
- **Supply chain and visibility risks**

This approach focuses on identifying where OCTEC may be directly linked to modern slavery practices through supplier relationships.

Key risk areas identified include:

- **IT hardware manufacturing** – particularly where supply chains involve overseas production or raw material extraction
- **Uniforms and textiles** – including potential exposure to forced or child labour in overseas manufacturing
- **Consumables and office supplies** – where supply chains may involve agricultural or low-skilled labour sectors
- **Facilities services (cleaning)** – industries typically associated with vulnerable workforces

While the risk within OCTEC's direct operations is assessed as low due to Australian workplace protections, we recognise that risks may arise indirectly through our supply chains.

We also recognise that vulnerable populations—such as migrant workers, low-income workers, and culturally and linguistically diverse groups—may be at higher risk of exploitation within global supply chains and there is a risk of being directly linked to modern slavery practices through these supply chains.

OCTEC has therefore adopted a risk-based and continuous improvement approach, whereby identified risks inform the actions taken to assess and address those risks, as outlined in Criterion 4.

Actions Taken to Assess and Address Risks (Criterion 4)

The actions set out below are designed to respond directly to the modern slavery risks identified in Criterion 3, particularly those associated with higher-risk procurement categories and lower-tier supply chain relationships.

OCTEC adopts a risk-based and continuous improvement approach, consistent with the United Nations Guiding Principles on Business and Human Rights.

Actions Taken During the Reporting Period

1. Risk Assessment

- Conducted structured risk assessments across operations and supply chains
- Identified higher-risk procurement categories and supplier profiles
- Applied risk-based prioritisation to procurement activities

2. Supplier Due Diligence and Engagement

- Introduced and issued risk-based supplier due diligence questionnaires to major suppliers
- Collected information on supplier policies and risk management practices

3. Procurement Controls

- Reviewed and updated supplier onboarding controls, including procurement checklists
- Embedded modern slavery considerations into policy and procurement processes

4. Training and Capability Building

- Procurement staff completed the following training through e-learning modules:
 - Modern Slavery in Public Procurement
 - Identifying and Assessing Modern Slavery
 - Managing Modern Slavery Risks
- Ongoing internal communication and guidance to raise awareness and support compliance.

5. Monitoring and Remediation

- Monitored supplier information and procurement activities for risk indicators
- Reviewed internal escalation pathways for concerns
- Maintained remediation processes, including:
 - investigation of potential risks

- supplier engagement and corrective action
- reconsideration or termination of supplier arrangements where required

6. Ongoing Approach

OCTEC will continue to prioritise actions based on risk level, the nature of its involvement and its ability to influence outcomes.

OCTEC commits to ongoing action to address any risks of exposure to modern slavery that we identify. This includes ensuring that our policies, procedures and controls remain valid and effective to mitigate any identified, new or increased risks we discover.

Assessing the Effectiveness of Actions Taken (Criterion 5)

OCTEC assesses the effectiveness of its actions through a combination of quantitative indicators, qualitative review processes and continuous improvement activities.

Effectiveness Measures

1. Supplier Engagement Metrics

- Number and proportion of major suppliers completing due diligence forms
- Quality and completeness of supplier responses

2. Procurement Controls

- Number of procurements subject to risk-based assessment
- Completion of supplier onboarding and due diligence processes
- Integration of risk considerations into procurement decisions

3. Training Outcomes

- Completion rates for procurement staff training
- Improved awareness of modern slavery risks and indicators
- Application of training in procurement and supplier engagement activities

4. Monitoring and Incident Review

- Identification and assessment of supplier risk indicators
- Review of any reported concerns or incidents
- Outcomes of supplier engagement and corrective actions

5. Continuous Improvement

- Periodic review of risk assessment methodology
- Refinement of due diligence and procurement processes

- Ongoing enhancement of supplier engagement approaches

For the next reporting period, OCTEC will:

- Review the development of a supplier code of conduct

Overall Approach to Effectiveness

OCTEC uses these measures to assess whether actions are:

- improving visibility of supply chain risk
- strengthening supplier engagement
- supporting effective identification and management of modern slavery risks

Findings from these assessments are used to adapt and strengthen OCTEC's approach over time.

Process of Consultation (Criterion 6)

OCTEC Limited does not own or control any other entities.

Accordingly, no formal consultation process is required under the Act. However, OCTEC ensures internal consultation occurs across relevant functions, including senior management and procurement teams, to support a consistent and coordinated approach to managing modern slavery risks.

Other Relevant Information (Criterion 7)

OCTEC acknowledges that its approach to identifying, assessing and addressing modern slavery risks continues to evolve in line with the scale and complexity of its operations and supply chains.

As an organisation with over 50 years of operating experience, OCTEC has well-established governance, procurement and operational frameworks in place. During this reporting period, OCTEC has taken further steps to strengthen the integration of modern slavery risk considerations into these existing systems, with a focus on embedding a more structured and risk-based approach.

OCTEC recognises that while progress has been made, further work is required to enhance supply chain visibility, strengthen due diligence processes and build organisational capability.

Priority areas for the next reporting period include:

- **Strengthening supplier due diligence and engagement**
including continuing the use of due diligence questionnaires and improving monitoring of higher-risk suppliers
- **Enhancing staff capability and awareness**
through continued training and integration of modern slavery risk considerations into procurement and operational practices
- **Improving supply chain visibility**
through a risk-based approach including supplier due diligence and awareness
- **Embedding governance and procurement controls**
including finalisation and implementation of procurement policies and a supplier code of conduct
- **Enhancing effectiveness measurement and reporting**
to better assess how actions contribute to identifying and addressing modern slavery risks

OCTEC is committed to continuous improvement and will progressively strengthen its systems, processes and controls to support a more mature and effective response to modern slavery risks over time.

Board Approval

This is OCTEC Limited's Modern Slavery Statement for the period 1 January 2025 to 31 December 2025. It was deemed to be approved by the OCTEC Limited Board on 25 June 2026.



Cr Jeff Whitton FAICD
OCTEC Chairperson

