

Unity Through Enterprise
The Arnhem Land Progress
Aboriginal Corporation



The Arnhem Land Progress Aboriginal Corporation (ICN 7137)

Modern Slavery Statement

Pursuant to the Modern Slavery Act (Cth) 2018


The Arnhem Land Progress Aboriginal Corporation (herein after referred to as "ALPA") is an Aboriginal Corporation registered under the *Corporations (Aboriginal and Torres Strait Islander) Act 2006*.

The ALPA Group welcomes the appointment of the Australian Anti-Slavery Commissioner and the ongoing government consultations to strengthen the Modern Slavery Act. We are committed to aligning our practices with the evolving regulatory landscape, including the proposed changes to enhance due diligence and compliance.

Addendum 1 hereto is a detailed history of the ALPA Group.

As the largest Independent Aboriginal Corporation in Australia, ALPA leads the way in Remote Retailing operating 27 community stores in the Northern Territory and Far North Queensland, Community Service Program Delivery, Enterprise, and Economic Development and Corporate Services. By generating modest surpluses through our commercial and non-commercial activities we demonstrate our economic independence and are therefore able to invest in charitable work through ALPA's community care programs for our remote First Nations communities.

Everything ALPA does focuses on training, developing skills, creating



jobs, and developing sustainable businesses for First Nations people in remote communities, and further to build an economy in our communities and our region.

In addition to ALPA proper, ALPA owns (or partially owns) the following subsidiary enterprises:

1. **Rulku Enterprises** is a joint venture with Milingimbi traditional owner organisation, Rulku Family Pty Ltd. The joint venture predominantly operates the Rulku Accommodation lodge in Milingimbi. There is also a civil labour hire component.


2. **Dinybulu Regional Services** is a joint venture with Ramingining traditional owner organisation, Bulungkunum Pty Ltd. The joint venture predominantly operates the Dinybulu Accommodation lodge in Ramingining, the mechanical workshop in Ramingining, the homelands housing

maintenance team and a labour hire component.

3. **Island & Cape Retail Enterprises** is a wholly owned subsidiary enterprise which operates retail stores in remote regions throughout Queensland and the Torres Strait. By virtue of ALPA's status as a Registered Training Organisation, training is also provided to staff of Island & Cape Retail Enterprises.

4. **Bukmak Constructions** is a wholly owned subsidiary enterprise, and its purpose is to carry out construction and concreting works in remote communities throughout the Northern Territory.

5. **Manapan Furniture** is a wholly owned subsidiary enterprise, and it operates a furniture factory based in Nhulunbuy and produces bespoke furniture, produced by Yolngu Craftspeople as a result of partnerships with world-renowned designers



During the reporting period this statement covers, we have actively engaged and consulted with all companies we own or control to produce this statement (entity's outlined in attachment A). We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

The ALPA Group is committed to upholding human rights with respect to our own employees and for workers within our supply chain. We are committed to preventing our involvement (and the involvement of our suppliers) in modern slavery. We stand with the Commonwealth in their desire to combat modern slavery more widely and welcome the reporting obligations of the *Modern Slavery Act (Cth) 2018*

(herein after referred to as "The Act") as a tool to combat modern slavery.

During our reporting period all divisions of ALPA were engaged and our approach was Corporation wide. We have implemented further measures to mitigate modern slavery risks within our organisation by ensuring divisional leaders and team members are aware of our obligations. It has been identified that our focus on indigenous and cultural rights is to remain a key focus as we operate in areas where members are vulnerable to economic and social challenges, through the power of enterprise we continue to deliver important community development programs and offer training and employment to community members where ALPA operate.

We recognise that modern slavery is a complex problem



and one which requires a committed and targeted approach by our Board, Executive and team. We set clear expectations of our ALPA team and suppliers (including contractors and agents) and are actively working to prevent and address any potential modern slavery in our supply chain.

In addition to the Act, ALPA is guided by the United Nations Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.


Within our own organisation (and our wholly and partly owned subsidiary enterprises) we are compliant with the *Fair Work Act 2009* and the relevant award wages throughout the diverse range of industry sectors within which we operate.

We are subject to a significant number of

Australian Federal, State and Territory statutory obligations, an exhaustive list of which would be too lengthy to list here and would provide little value to the public in identifying whether ALPA is taking sufficient action to address the risk of modern slavery existing in our supply chain.

However, to compliment these legislative requirements, ALPA has internally developed and implemented an *Ethical Sourcing and Modern Slavery Policy* and an *Employing Minors in the Workplace Policy* which set out ALPA's commitment to preventing modern slavery in our businesses.

ALPA has had significant changes in its governance and leadership personnel in 2024 electing a new Chairperson, Matjarra Garrawurra from Ramingining and Deputy Chairperson, Don Wininba



from Galiwin'ku. Both are senior leaders in their communities and our region and have been briefed on ALPA's commitment and obligations to the Modern Slavery Act. A focus remains on a team of Executive and Senior Management personnel to continue to examine our supply chain across the ALPA Group (including its subsidiary enterprises.)

The team ensures relevant managers and personnel of all four of ALPA's divisions are briefed and the Board has been kept apprised of progress at quarterly intervals.


In excess of 100 suppliers and providers have been contacted since the commencement of the Act. All suppliers have been mapped on a matrix which identifies the level of risk a

supplier poses, based on an objective assessment which incorporates, amongst other things:

1. The sector or industry within which the supplier operates (and therefore whether their labour is predominantly unskilled or seasonal, subject to short term contracts or outsourcing or may be made up of foreign workers or those on temporary visas)
2. The product or service the supplier offers (and therefore whether they offer unrealistically short turnarounds on delivery, or products which change frequently with seasonal trends, or may offer products sourced from high-risk countries¹.

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<https://www.globalslaveryindex.org/>




3. The supplier organisation itself (particularly in respect of their governance structure, track record in human rights, management, procurement and auditing processes and formalised policies and procedures.)

4. The supplier's geographic location or shoring (and therefore what legislation they are subject to, whether there is adequate protection for workers under any such legislation, whether there were risks of poor governance and/or weak rule of law in the region and whether there was conflict or a risk thereof in the region)

5. Hidden risks (for example, little visibility or oversight of workers) Once these risks had been mapped and each of the suppliers had been assigned a risk rating, suppliers were contacted by ALPA and advised of ALPA's expectations of them if they were to continue to remain a preferred supplier of ALPA.

ALPA recognises that it would be almost impossible to guarantee that there is no risk of slavery existing within our supply chain. However, we took a risk-based approach to considering each suppliers' response. That is to say, the risk posed by a local meat supplier, employing 3 staff in a meatworks which is subject to Work Health Safety, Fair Work and Public Health legislation, posed a lower risk than a supplier of general merchandise whose products were manufactured offshore. It was in the context of the individual supplier's risk rating that their response was considered. Some of ALPA's significant international suppliers were already subject to reporting obligations under the Act (themselves being considered reportable entities) and those suppliers faced a more rigorous examination of their policies and procedures.




ALPA already prioritises smaller, local suppliers as part of our mission *"... to operate successful and responsible businesses emphasising local employment, training, career pathways, customer service and safety. We strive to improve the health, quality of life, and economic development of our members, giving primacy to their cultural heritage, dignity, and desire for opportunity and equality with their fellow Australians."*

Prioritising small, local suppliers encourages the development of economies in our remote communities and has, even prior to the enactment of the Act, mitigated the risk of modern slavery existing within our supply chains

It is important to note that as leading remote retail operators our focus is primarily on essential goods

including food and grocery products. Despite this we do have General Merchandise and Apparel products and as a majority of these items are sourced via wholesalers that import from certain countries, we recognise this is where a higher risk in the supply chain lies, in terms of employees working excessive overtime, forced labour and migrant labour exploitation.

As such ALPA has strong supply relations with large corporations that also comply with the Modern Slavery Act. Key partners such as Metcash, Australian Grocery Wholesalers and Simon George and Sons as examples who have direct contact with thousands of manufacturers and are expected to work together with ALPA to ensure we minimise our exposure to modern slavery risks, through their knowledge and recommendations on supporting farmers and




manufacturers who themselves have ethical sourcing programs.

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward.

In this reporting period we continue to enhance our procurement guide. This provides a clear standard when it comes to procedures and procurement processes across all divisions. All new trading partners are to be reviewed and signed off by the respective procurement representative in each entity. All trading and supply partners are reviewed and

authorised by the merchandise manager. An ALPA representative attends

and does a workplace tour of any new local supply partner ensuring team members have access to safe and responsible workplace. Part of onboarding an enquiry is made to see what mechanism the company offers its team members i.e.: employee assistance programs. A review to our procurement standards includes modern slavery clauses and mandates that all new and current suppliers who come due for renewal. In this reporting period we have renewed 14 of our major supply agreements, supplier engagement was strong and underwent due diligence checks with 100% agreeing to our new trading terms with the inclusion of modern slavery clauses. To assess and mitigate risk, ALPA's senior buyers who are responsible for sourcing goods and services are



involved in procurement programs and ensure fair sourcing models are

followed. Utilisation of tenders and quotes from multiple suppliers are reviewed and pricing is queried if it is significantly lower than competitors and market value. In our next reporting period ALPA will involve all merchandisers in further training on identifying and tracking our supplier performances in relation to ethical sourcing.

The supplier onboarding process has been evolved to adequately reflect ALPA's expectations of our suppliers. Our trading terms now include a specific section on the Act and our obligations thereunder. These terms were developed based on legal advice received from ALPA's respected external Solicitors and Advisors.

We have, additionally, attempted to identify external training that might be administered to suppliers as part of their onboarding

process. Furthermore, we have sought (and received positive undertakings) from some of our larger key suppliers as to any education or training programs they offer their teams on the subject of modern slavery. We look forward to continuing those discussions and ultimately identifying a more formal method of delivery of these courses. Essentially, ALPA's approach to combatting modern slavery can be summarised as follows:

1. Training & Education.
2. Consultation with Divisional leaders and merchandise teams:
3. Supply chain mapping.
4. Risk assessment.
5. Addressing and remediating risks.
6. Evaluation and monitoring.
7. Policy development.

8. Governance.

Collaborative partnerships
(with industry colleagues and
suppliers.)

ALPA's focus is, and will
continue to be, combatting
modern slavery in our supply
chain. We recognise our role
as an industry leader in this
endeavour whilst also
seeking guidance from our
industry colleagues.

We acknowledge that taking
action to combat modern
slavery also makes good
business sense. Doing so can
protect against damage to
our business, improve
member and customer
confidence in our business,
sustain profitability and
improve the integrity and
quality of our supply chain.

Modern slavery is a very real
risk globally, including here in
Australia, and it is incumbent
upon organisations like ALPA
to take every step they can
to prevent the damage

caused by this insidious
practice.

For more information on the
ALPA Group's response to
modern slavery please

contact the Corporation
secretary at
alastair.king@alpa.asn.au

This statement has been
approved by way of
resolution of the ALPA Board
of Directors on the 25th day
of June 202 and was again
updated on the 24th of
September 2025.

Signed for and on behalf of
the Board of Directors:



Matjarra Garrawurra
Chairperson



Don Wininba
Deputy Chairperson

