



Voluntary Modern Slavery Statement 2025

THE FREEDOM HUB LTD ABN 18 168 768 630

Modern Slavery happens in Australia. If you are looking for help, or someone to talk to, please reach out to 1800 FREE HUB or info@thefreedomhub.org.

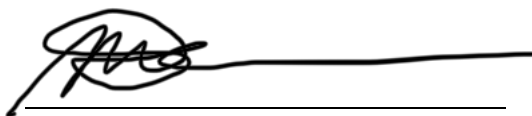


ABOUT THIS STATEMENT

This is the Freedom Hub's fifth modern slavery statement, developed in accordance with section 13, Modern Slavery Act 2018 (Cth) (**the Act**). This statement is submitted voluntarily under section 6 of the Act, with notice provided to the Minister on 30 June 2026.

The Freedom Hub has amended its reporting period to a calendar year.

This statement was signed by the Freedom Hub's Managing Director in accordance with section 2(d) of the Act on 29 June 2026 and approved by The Freedom Hub's Board of Directors in accordance with section 2(c) of the Act on 29 June 2026.

A handwritten signature in black ink, appearing to read 'Mark Tailby', followed by a horizontal line.

Mark Tailby, Chair of the Board

MESSAGE FROM OUR FOUNDER

In 2024, The Freedom Hub proudly surpassed its 10-year anniversary, marking a significant milestone in our mission to end modern slavery in Australia. As we looked ahead, we established a bold 10-year vision: to have a Survivor School operating in every Australian state by 2034, funded through our Social Enterprises and Ethical Business Services.

To prepare for this next stage of growth, 2025 began with a full organisational restructure. We moved to a four-day working week to reduce staffing costs, consolidate roles, and create a stronger, more sustainable foundation. This allows us to grow intentionally, with the goal of returning to full-time capacity in each area as our impact and income expand.

A major step forward was securing a Survivor School location in Queensland and engaging with three large reporting entities in Brisbane. These partnerships reflect the growing demand for our unique expertise.

The Freedom Hub is distinct because we work directly with survivors of modern slavery. This enables us to provide survivor-informed guidance and lived experience expertise to businesses seeking to strengthen their human rights due diligence. This work is placing us in high demand and moving us closer to our vision: ending modern slavery in Australia.

A handwritten signature in black ink, appearing to read 'Sally Irwin', followed by a horizontal line.

Sally Irwin, Managing Director

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3. Modern slavery risk identification	Our Modern Slavery Risk, pg. 8
4. Actions taken to address modern slavery	Our Response, pg. 9
5. Assessing effectiveness of actions taken	Assessing Effectiveness, pg. 11
6. Process of consultation	<i>The Freedom Hub does not own or control other entities</i>
7. Other information	Our Purpose, pg. 12

*The Freedom Hub would like to acknowledge the Gadigal people of the Eora Nation, the traditional custodians of the land where we work, live, and connect.
We wish to pay our respect to Elders both past and present.*



OUR STRUCTURE AND OPERATIONS

WHO WE ARE AND WHAT WE DO

Established in 2014, The Freedom Hub ("TFH") is an Australian public company, limited by guarantee and registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC). **Our purpose is to end slavery in Australia, help survivors rebuild and recover from the crime of slavery, and partner in the global fight to end slavery.**

We do this by providing rehabilitation services and lifelong support for victims of modern slavery through our purpose-built Survivor School and associated programs. We fund these essential pieces of social infrastructure through income derived from our suite of social enterprises that include our café and event venue, catering services, wholesale, online retail, and ethical business advisory services. Income is also derived by public donations, limited grant funding, private philanthropy, community fundraising and other in-kind support.

Our social enterprises are comprised of **three core business units that fund the charity** (See Figure 1 below). During the reporting period, TFH underwent a restructure to set us up for growth. The charity and social enterprise business units were separated to report to their own managers. The Managing Director continued to report directly to the TFH's Board of Directors comprised of seven volunteer directors.

During the reporting period we employed 6 part-time staff, and 2 casual staff to facilitate our operations. In addition, we continue to engage a network of about 12 volunteers across NSW and Qld who support our work in the areas of fundraising and events, marketing, community engagement, corporate services, and administration.

These for-purpose social enterprises offer the public an opportunity to engage with the anti-slavery movement through responsible and ethical purchases, information sharing and learning opportunities, as well as avenues to provide financial and in-kind support.

Figure 1. *Structure of The Freedom Hub*



THE FREEDOM HUB SURVIVOR SCHOOL

DELIVERING ON OUR PURPOSE

Our Survivor School provides lifelong wrap-around support to victim-survivors of slavery to help **rebuild their lives**. Through the delivery of free, personalised classes covering a range of subjects, students and alumni of the Survivor School are **supported** to develop the skills and confidence for independent living, sustainable employment, and a free and fulfilling social life.

Our **training and skills courses** are designed in a trauma-informed manner and consider students' preferences and personal circumstances, offering both face-to-face and online class formats, with selected face-to-face classes located at confidential locations in New South Wales and Queensland to protect students' privacy.

During the reporting period, our Survivor School assisted
185 survivors of modern slavery.

Students and alumni can also participate in **recreational activities** organised by our Peer Support Program. These activities help to rebuild students' confidence and enjoyment of socialising with peers in the community, or at private events hosted by local partners.

We also partner with select local businesses - with a commitment to addressing modern slavery - to provide **paid work experience and employment pathways** for our students.

As many of our Survivor School students and alumni are persons with complex trauma-related needs (cPTSD), staff and volunteers involved with the Survivor School receive specialised training about trauma-informed care. Trauma related to experiences of modern slavery and exploitation is complex and may take years to identify or present in an individual.

Many victim/survivors cannot leave the circumstances in which they experience a condition of slavery. This makes reporting to authorities difficult. The Survivor School accepts referrals from the community and can provide personalised support through our school or alumni programs. If you are looking for help, or someone to talk to, please reach out to
1800 FREE HUB or info@thefreedomhub.org.

THE FREEDOM HUB SOCIAL ENTERPRISE

FUNDING OUR MISSION

CAFÉ, EVENTS & CATERING

Located on Gadigal Land in Waterloo, Sydney, the Freedom Hub Café and event venue is a meeting place for the community, our staff, and volunteers. The **café** provides ethically sourced food and drinks and information about modern slavery, and the **event venue** gives Sydney residents a place to host community events, fundraisers, corporate and private events. Our ethical **catering services** enable organisations, businesses and non-profits across the Sydney CBD area to make responsible catering procurement choices.

ETHICAL RETAIL & WHOLESALE

The Freedom Hub also promotes, distributes, and sells local and ethically sourced goods in our café, online, and for bespoke fundraisers. Our products include coffee, tea, soy candles, jewellery, and art prints.

The story behind our coffee

Coffee beans are an everyday product frequently connected with forced and child labour across the world.

Our ethically sourced Freedom Fighter blend coffee is picked and processed under best practice controls to ensure it is slavery free. Purchases of the Freedom Fighter blend directly support the local community and workers by investing in clean water and sanitation programs, health clinics, and the rescue and rehabilitation of child soldiers.

ETHICAL BUSINESS SERVICES

The Freedom Hub launched its Ethical Business Services in 2020 to help organisations act to end modern slavery and provide a pathway to get there through survivor-informed guidance.

Our services include:

- Gap Analysis & Compliance Benchmarking
- Modern Slavery Statement Development & Review
- Group Workshops, Lunch n Learn sessions, Procurement & Supply Chain Training
- Corporate Incident Response & Remediation Planning

SURVIVOR ADVISORY BOARD

In 2021, the Freedom Hub launched its **Survivor Advisory Board (SAB)**. The SAB is a group of community members with lived experience of modern slavery who want to engage with academics, businesses, and government in relation to modern slavery, but wish to do so **anonymously**.

In the safety and anonymity of the SAB, members can:

- provide feedback on modern slavery and related reports or statements
- answer researchers' interview questions, and
- comment on government policy, etc.

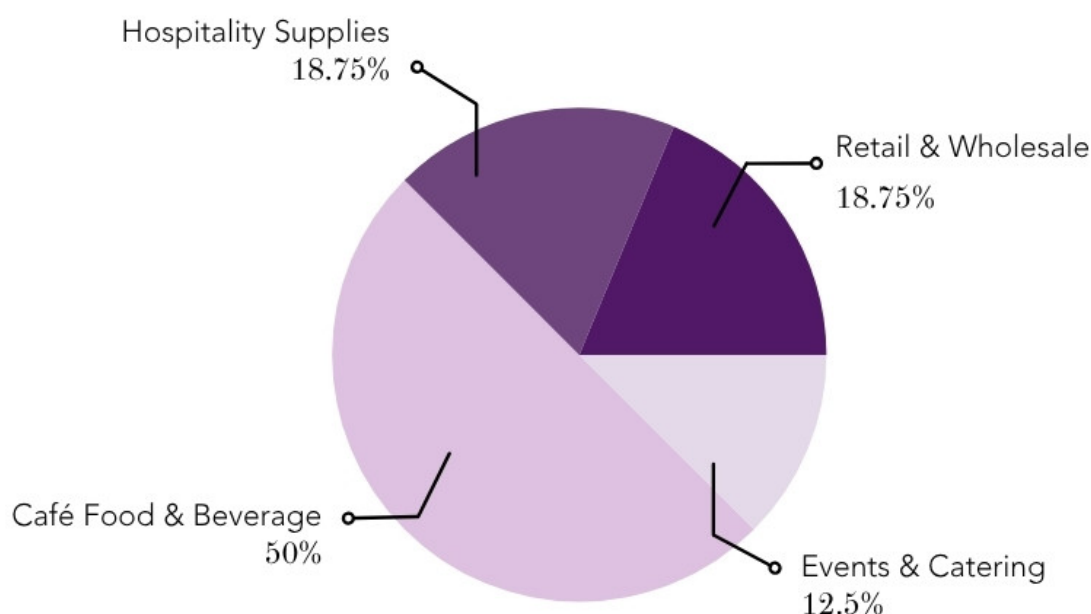
Members of the SAB have either completed the Freedom Hub's Survivor School program or have typically lived in the community for at least 5-10 years after leaving the condition of slavery. They are paid an above-market rate for their consulting.

During the reporting period, two corporations contracted the SAB for feedback on documents relating to their modern slavery response.

OUR SUPPLY CHAIN WHO WE WORK WITH

At the end of the reporting period, the Freedom Hub had a total of 16 first-tier suppliers providing goods for our café, events, catering, wholesale, and retail social enterprises. All suppliers for the reporting period are in Australia. We prioritise engaging with local businesses and building longstanding relationships with other social enterprises.

Figure 2: *Supplier Breakdown, total number of suppliers.*



OUR MODERN SLAVERY RISK

We regularly assess our suppliers to monitor the products and services we purchase for our social enterprise and Survivor School activities. Our risk assessment methodology is detailed under 'Our Response' on page 9.

The products we procure considered to be highest risk of having links to modern slavery include:



COFFEE

Production of coffee beans is linked to child labour and entrenched debt bondage across East Africa, South America and Southeast Asia.



TEA

Growing and picking tea leaves is linked to child labour, forced labour, and debt bondage in India.



CHOCOLATE

Production of cacao beans, the primary ingredient of chocolate, is linked to forced and child labour in West Africa and South America.



PRODUCE & MEAT

Produce and meat used in our café, events, and catering may be linked to forced labour and exploitation, due to the risks in Australia's agriculture and meat processing sectors, which rely heavily on temporary migrant workers.



OTHER FOOD & BEVERAGES

Food products procured for the café, events, and catering, including baked goods and dairy may be produced in unsafe working conditions or linked to bonded labour.



CLEANING SERVICES

There is evidence of cases of bonded labour and deceptive recruiting in the Australian cleaning sector, targeting migrant workers who may be coerced to accept lower pay or other substandard working conditions.



IT EQUIPMENT

Our business and Survivor School require the use of various laptops, tablets, desktop computers, phones, and an EFTPOS system. Electronics remain the highest value at-risk import of forced labour for the majority of G20 countries.

OUR RESPONSE

As an anti-slavery charity, we conduct a broad range of community and awareness-raising activities. This section discusses the actions applied by the Freedom Hub or undertaken by employed staff to assess and address risk. Volunteer-lead advocacy is reported under our response to mandatory reporting criterion 7 (pages 12-13).

POLICIES

TFH has a series of policies designed to reflect our commitment to respect responsible business and human rights and lay the foundations for managing and responding to modern slavery risks. These policies were maintained during the reporting period.

TRAINING

Empowering our people to understand and identify modern slavery is a key part of our response to address risk. Training content and design is reviewed annually, and the data is updated to stay up-to-date with the latest research, as it is published. Training sessions we have run over the reporting period include:

- Internal Training - All employees, interns, and volunteers must undergo modern slavery training as part of their onboarding
- Supplier Training - This is part of the supplier onboarding process. We facilitate a session to discuss what modern slavery is, what risks may be most relevant to their organisation, and how to prepare a modern slavery statement.

SUPPLY CHAIN ENGAGEMENT

All suppliers are required to sign our *Supplier Code of Conduct for an Ethical Business* which asks our suppliers to verify their compliance with relevant laws related to modern slavery. In addition, they must also sign our *Supply Chain Transparency Agreement* which asks suppliers to confirm that they will act ethically in all their operations, relationships, and practices.

Suppliers are pre-screened based on their inherent modern slavery risk. The screening criteria draws from the Act and other responsible business standards that consider governance, procedures, sustainability, and monitoring.

The Risk Analysis and Measurement Platform (**RAMP**) allows TFH and our suppliers to identify risks, map existing controls, and designate action to improve transparency, mapping modern slavery risk based on the following four categories:

BUSINESS RISK

Assess the respondent's company to understand risks in their operations, workforce, grievance reporting and other business activities.

VENDOR RISK

Assess suppliers, affiliates, portfolio companies or other business relationships for risk in their supply chain management, locations, policies, and accreditations including work health and safety.

PRODUCTS & SERVICES RISK

Assess the products, raw materials, services, investments and countries they are sourced from. These are weighted by TFH to assess level of risk.

DUE DILIGENCE

Assess the company's governance, transparency, accountability, and compliance obligations against the Australian Modern Slavery Act.

Examples of how we mitigate risk in our inherently high-risk products include:

- Coffee: We use of a single roaster from a social enterprise that supports the rescue of child soldiers.
- Tea: Our supplier grows their tea leaves in Australia with a small workforce, and is audited to ensure workers' health, safety and wellbeing.
- Chocolate: We source chocolate through Australian businesses such as the indigenous social enterprise *Chocolate on Purpose*.

Remediation

The Freedom Hub is committed to remedying situations where we may cause or contribute to modern slavery. TFH uses the platform *Whispli* as its primary mechanism for reporting grievances. During the reporting period, there were no reported instances of modern slavery.

TFH continues to work closely with the Australian Federal Police and the Red Cross *Support for Trafficked Persons Program* as a facilitator for the remediation of victim/survivors of modern slavery in Australia.

If a victim/survivor of slavery is identified within Australia, we assess our process on a case-by-case basis, but our immediate priority is to assess their mental health, physical health, level of danger they are in, and provide for their short-term needs with other care providers.

If TFH is positioned to provide long-term support, we will onboard them into the Survivor School program.

With regards to slavery overseas, The Freedom Hub networks with a range of non-government organisations in various countries working in human rights and modern slavery to engage with on-the-ground experts and advocates.

Some of these NGO's and coalitions include:

- International Justice Mission
- Destiny Rescue
- Be Slave Free Coalition
- Eden
- Zoe, and
- the Commonwealth 8.7 Network.

ASSESSING EFFECTIVENESS

Effectiveness Assessment	2025 Action	Future Action
Governance		
Human rights policies to be reviewed every 3 years.	Policies maintained; no new human rights policies were introduced.	Policies due for review in 2026.
Training		
100% of staff, volunteers and interns to complete modern slavery training.	100% completed training as part of onboarding.	Any new staff, volunteers and interns to complete training. Continuing staff to complete a training refresher annually.
100% of new Tier 1 suppliers to complete training.	1 new supplier onboarded, other suppliers offboarded before training could be completed.	Any new suppliers to complete training. Continuing Tier 1 suppliers to complete a refresher training, planned for 2026.
Organisations working with TFH engage their employees/ stakeholders in efforts to address modern slavery.	27 corporate/business trained in human rights due diligence and slavery compliance.	Increase the number of corporate/business trained in human rights due diligence and slavery compliance to 30.
Supply Chain & Suppliers		
100% of Tier 1 suppliers to assess their risk of modern slavery.	75% (12/16) of our goods suppliers are currently addressing their risk of modern slavery or have committed to doing so. • 9 have a signed <i>Supply Chain Transparency Agreement</i>. • 3 have a Modern Slavery Statement. • We are working with the remaining suppliers to begin assessing their modern slavery risk.	We are committed to engaging with all our suppliers to bring awareness to the issue of modern slavery and work with them to assess their risk. Where a supplier remains unresponsive, we will take proportionate steps to escalate our engagement and review the relationship in line with our <i>Supplier Code of Conduct for an Ethical Business</i> .
All Tier 1 suppliers mapped.	16 'goods' suppliers mapped. Mapping Tier 1 services suppliers has begun.	Finish mapping Tier 1 'services' suppliers.
Grievances & Remediation		
100% of grievances reported escalated to MD and Board of Directors	No reports.	Conduct a training on TFH Whistleblower policy for staff, volunteers, interns, and Tier 1 suppliers.
Remediation where TFH has been found to contribute to or cause human rights' harm.	None required.	Ensure internal and supplier training includes trauma-informed remediation principles in line with the UNGPs.

OUR PURPOSE

The Freedom Hub is a leading anti-slavery organisation in Australia. Our volunteer network and student interns actively engage with the community to raise awareness of modern slavery, human rights, and what we can do about it corporately and as individuals. Our volunteers help us with:

- Hosting fundraiser and networking events
- Running community markets and social media campaigns
- Awareness raising and public speaking



Our staff and volunteer network have joined or hosted many advocacy opportunities in NSW and Queensland during 2025. We estimate between all the community, corporate, and fundraising events we have promoted the issue of modern slavery to **over 61,700 people** this reporting period.

ETHICAL BUSINESS SERVICES

Supporting Clients to Strengthen Modern Slavery Prevention, Response and Remediation

During the reporting period, The Freedom Hub's Ethical Business Services team supported organisations across construction, property, infrastructure, hospitality, food and beverage, retail and financial services to strengthen modern slavery awareness, due diligence, grievance mechanisms and remediation pathways.

Through training, workshops, scenario testing, supplier engagement and policy review, we helped clients move beyond compliance and translate modern slavery risk into practical operational action. Our work is grounded in survivor voice, lived experience and trauma-informed practice, helping businesses recognise how coercion, debt, isolation, fear and lack of worker voice can appear in everyday commercial settings.

This included specialised training for more than 680 **Gamuda Australia** employees, supporting stronger awareness of modern slavery risks across the business and complementing Gamuda's broader efforts to protect migrant workers through VEVO verification and the appointment of a Global Migration Advisor.

We also partnered with **Landcom** to test and strengthen its approach to identifying, escalating, responding to and remediating potential human rights harms across its operations and supply chain. This included real-time scenario testing of grievance mechanisms and response flows, followed by an Incident Response and Remediation Workshop with senior leaders and key personnel. The work helped assess the practical effectiveness of Landcom's escalation pathways, incident response protocols and

remediation approach, while bringing a trauma-informed and lived-experience lens to the review.

As part of our own ethical sourcing approach, we engaged **Organic Merchant** as a tea supplier for 2026 onwards and supported the business to develop a voluntary Modern Slavery Statement, helping strengthen transparency and awareness across its global tea supply chain.

Metcash strengthened its ethical sourcing framework through tailored e-learning for procurement and merchandise teams, alongside a company-wide Human Rights Day webinar delivered in partnership with us. The webinar focused on modern slavery in supply chains and operations, using survivor accounts and real-world insights to help employees understand where risks may arise and how they can help identify and respond to concerns.

In financial services, **Commonwealth Bank** (CBA) prioritised work with suppliers providing fresh produce, meat and poultry. CBA then partnered with The Freedom Hub to deliver tailored training to these suppliers, further deepening their understanding of modern slavery risk in their sectors. This formed part of CBA's broader Human Rights Control Program and Supplier Improvement Plan process, which included practical support such as desktop due diligence and adverse media screening of fourth-party suppliers.

The Freedom Hub also supported **Pinnacle Investment Management**, including in relation to its supplier Hyperion Asset Management, to assess grievance mechanisms against the UN Guiding Principles on Business and Human Rights Effectiveness Criteria. This work helped identify opportunities to strengthen the accessibility, transparency and effectiveness of grievance channels.

Across these engagements, The Freedom Hub supported clients to build awareness, strengthen internal capability and embed more survivor-centred, rights-respecting approaches to modern slavery prevention and response. All profits generated through Ethical Business Services are directed back into The Freedom Hub's Survivor School, ensuring our work with business directly supports survivors to recover, rebuild and move towards long-term independence.

ACCREDITATION AND INDUSTRY PARTNERSHIPS

We are regularly looking to review and improve our social enterprise by joining accreditation programs that recognise responsible business conduct. Over the last reporting period, we maintained our accreditation for the following:

- **Social Traders**: we are recognised by the leading industry body for social enterprise in Australia, and certified that a substantive portion of our profits from trade is invested into our charitable purpose.
- **Responsible Cafés**: an organisation that offers opportunities to network with other cafés with programs to reduce waste, carbon emissions, and impact on the community.

- **People + Planet First:** A Social Enterprise World Forum (SEWF) verification that independently validates that our operations, ownership structure, and surplus support our mission to end slavery.
- **Good Market Global Accreditation:** an organisation that recognises our commitment to positive impact through our Survivor School program and Business activities.

Partnerships between government, businesses, and civil society are key to eliminating modern slavery in Australia and supporting survivors. TFH is a member of the following anti-slavery coalitions:

- NSW Forced Marriage Network
- NSW Trafficking Response Network
- Commonwealth 8.7 Network Management Committee
- National Action Plan (NAP) to Combat Modern Slavery Measurement and Evaluation Advisory Group
- NAP Forced Marriage Protection Orders Advisory Sub-committee
- Westpac Safer Children, Safer Community Advisory Group, and
- QNEST (Queensland Network to End Slavery & Trafficking Management Committee).

We are proud of the impact we are having, both on survivors of slavery and in raising awareness within Australia of the scale and effects of slavery.

