

Modern Slavery Statement

FY 2024



Preamble

This Modern Slavery Statement has been prepared to meet the requirements of the *Modern Slavery Act 2018* for the period 1 July 2023 to 30 June 2024 (FY2024).

Introduction

Ability WA is committed to acting ethically and with integrity in its business operations and relationships. This includes adopting a continuous improvement approach to understanding and addressing modern slavery risks throughout its business and supply chains.

This statement marks the business' first year as a reporting entity and outlines actions taken by Ability WA in FY2024 to identify and address modern slavery risks.

Structure

Ability Centre Australasia Ltd, trading as Ability WA (ABN 79 057 702 959) is a notfor-profit company limited by guarantee which is established to be, and continues as, a Registered Charity and is a National Disability Insurance Scheme (NDIS) registered provider.

Ability WA is overseen by a skilled and experienced Board of Directors, and supported by an effective governance committee structure. The Chief Executive Officer leads an established executive team, overseeing a 1,270 strong workforce delivering services to 1,597 people across the Perth metropolitan area.

Ability WA is not a subsidiary of a parent company. Ability WA owns and controls the following businesses, which are governed by the Ability WA Board and management under Ability WA's ABN in the Perth metropolitan area:

- Ability TECH Customised Solutions
- Goodwill Engineering

Operations

Ability WA delivers allied health, accommodation, daily living, community access, equipment and employment services to people living with disabilities in Western Australia, and has done so for over 70 years. Ability WA specialises in supporting people living with disability who have complex multidisciplinary service needs across their lifespan.

To support its purpose of empowering people to realise their abilities, Ability WA operates two commercial enterprises to provide both employment and skills development for people requiring tiered levels of support to enter and remain in the workforce. This includes operating two recycling facilities and Goodwill Engineering, a manufacturing firm producing products primarily for the building and construction industry.

Ability WA operations also include the creation, modification and distribution of assistive technology equipment for people with disabilities such as customised wheelchair inserts and modifications.

Ability WA has in place policies, procedures and frameworks to recognise and safeguard human rights of people accessing Ability WA services (customers) and employees. This includes anti-slavery, procurement and whistle-blower policies.



Supply chain

To enable its operations, Ability WA procures goods and services from domestic and international suppliers. Goods and services purchased by Ability WA include:

- Labour, through direct employment under Australian employment law or contract labour hire to provide direct and indirect services to customers;
- Raw materials manufactured into commercial goods produced for sale by Goodwill Engineering and Ability TECH;
- Consumable items such as disposable personal protective equipment, and
- Services commercially contracted to support business operations such as cleaning, property maintenance, audit, consultancy, equipment servicing, and information and communication technology services.

Modern slavery risks

Addressing modern slavery risks can be a complex and challenging process.

In the first year of reporting, Ability WA has taken a staged approach to understanding its modern slavery risks and raising awareness across the business. This has involved considering the potential for the business to cause, contribute to, or be connected to through another entity, modern slavery practices.

The risk of modern slavery practices occurring directly through its business operations is low given our geographical risk and unwavering commitment to compliance with the Fair Work Act 2009 and employment law, supported by robust processes.

A focus of the reporting period has been centralising and modernising procurement practices and implementing new procurement governance processes. This work has now concluded, which will allow the business to form a deeper understanding of its supply chain, such as Goodwill Engineering raw materials suppliers, Ability TECH equipment suppliers, contracted labour hire firms and consumables suppliers. This work will commence in FY2025 and will build upon the contemporary procurement practices already introduced into the business.

Action taken

Ability WA has undertaken the following actions to assess and address the risk of modern slavery practices in its business and supply chain during FY2024:

- 1. Developed and implemented an anti-slavery policy;
- 2. Provided education to leaders across the business on modern slavery risks;
- 3. Commenced risk workshops with leaders from across the business to identify and assess modern slavery risks and controls;
- 4. Established a procurement governance framework to inform procurement decisions, activities and delegations;
- 5. Conducted an end-to-end review of multiple procurement processes;
- 6. Implemented an organisation wide procurement system to provide central records and oversight of procurement and suppliers;
- 7. Rationalised the number of suppliers through active contract management and aggregation, and
- 8. Developed and published a procurement intranet site with education tools.



Action effectiveness

Ability WA has a zero-tolerance approach to modern slavery.

Ability WA has in place various control measures to monitor and report modern slavery risks. No instances of modern slavery were detected or reported in FY2024.

Should an alleged instance of modern slavery be detected in its operations or supply chain, Ability WA will document, refer the matter to external compliance and enforcement agencies where relevant, investigate, take corrective action and ensure effective safeguards are in place to prevent similar instances reoccurring.

Next steps

Ability WA is committed to continually improving its systems and controls to ensure modern slavery practices do not occur in its operations or supply chain.

The focus of the next reporting period is to continue to build capacity through:

- Further risk workshops across the business with operational leaders and key stakeholders to identify, assess and monitor modern slavery risks;
- Risk assessing suppliers to inform a due diligence process for monitoring modern slavery risks of suppliers and their compliance with the *Modern Slavery Act 2018*
- Develop a supplier code of conduct, and
- Review Ability WA contract management practices and templates for modern slavery obligations.

Conclusion

Ability WA's commitment to addressing modern slavery risks is inherent within the risk appetite of the Ability WA Board for no tolerance for activities which violate laws and regulations. This commitment is reflected in Ability WA's efforts to continually improve its understanding of modern slavery risks and actions to prevent, detect and address the occurrence of modern slavery practices.

Authorisation

This statement was approved 10 December 2024 by Ability WA's Board of Directors.

Dianne Ritson Chair Board of Directors Ability WA

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10 December 2024

