

Modern Slavery Statement

Allambi Care Limited

This Statement is submitted on behalf of Allambi Care Limited (ABN 24 097 262 459) (**Allambi Care**) under section 13 of the *Modern Slavery Act 2018* (Cth) (**MSA**) to cover the reporting period of 1 July 2022 to 30 June 2023.

Criteria 1 and 2: Identification, Structure, Operations and Supply Chain (MSA s16(1)(a) – (b))

1.1 Structure

Allambi Care was established in 1981 and is a Charity and a Public Benevolent institution, meaning its main purpose is supporting the most vulnerable and at-risk individuals and families in the community.

Allambi Care is the parent body. Allambi Care holds the following registered business names:

1. TACT Training;
2. Tracks Health;
3. North Academy;
4. Community Property Maintenance.

Allambi Care also trades under the name Allambi Youth Services Incorporated. Allambi Care does not own or control any subsidiaries.

1.2 Operations

Allambi Care is a multi-disciplined and recognised leader in the human services field working across Newcastle, the Hunter, Alstonville, Lake Macquarie, the NSW Central Coast and Victoria. Allambi Care is committed to supporting our community's most vulnerable people through tailored services and programs. From our beginnings as a crisis youth refuge, to where we are today, our mission has remained clear – to empower those within our community to reach their full potential and to support them towards a positive future.

We offer a range of services across the following areas: Therapeutic Youth Care, Foster Care, NDIS Services, Outreach & Early Intervention Programs, Specialist Homelessness Services, Clinical Services, Education and Training.

Allambi Care engages 1,201 staff of which 42.4% are casuals and the remainder are permanent employees. We had one staff member on a visa in the relevant reporting period. We owned 12 properties; 7 were residential properties, and 5 were commercial properties including our head office, and some properties leased to health and education organisations.

In December 2022, Allambi Care acquired the United Protestant Association (**UPA**), an organisation that established and ran children's homes, cottage homes and foster care placements. A number of UPA staff stayed on with Allambi and these staff are included in

the figures above. The portion of our workforce on casual arrangements increased in this reporting period because of the UPA acquisition.

1.3 Supply chain

Allambi Care had 856 suppliers in the reporting period. We are in the process of adding more detail to our fulsome supplier list so we can undertake some targeted supply chain mapping in future reporting periods.

Allambi Care has a unique supply chain as a result of the work that we do. We contract with suppliers for two main purposes:

1. **Direct Client Suppliers** – these are goods/services that are procured specifically for each individual client we work with. For example, health appointments tailored to that client and even goods such as a fish tank for a specific client. Our clients are vulnerable individuals with a diverse range of needs in a diverse range of circumstances, so these suppliers vary greatly. Of course, because of the changing needs of our clients and the sometimes-transient nature of this work, it is impossible for this aspect of our supply chain to be anything other than agile and interchangeable to respond to the needs that arise.
2. **Operational Suppliers** – these are the typical suppliers that many businesses will have in order to run operations more generally. For example, financial and legal services, office furniture, cleaning services etc. We contract with Operational Suppliers on a more long-term basis in more stable arrangements.

We know many of our suppliers are located in Australia and supply a range of goods and services to Allambi Care and are in the process of mapping our supply chain in more detail. Our suppliers include: lawn and arborist services; whitegoods, wardrobe and garage door repairs and maintenance; carpet laying, locksmith, plumbing, carpentry, electrician, flooring and plastering services; security screen, automatic gate/door and glass installation; air-conditioning; alarm system and fire safety services; blinds, antennas, whitegoods, safes, timber, and office furniture; hygiene, carpet & upholstery and general cleaning services; waste removal and pest services; tank water and pool services; stationery; document management; financial and legal services; insurance; government services; training services; risk and business consultancy services; information and technology goods and services; postage and printing services; clinical supervision; pharmaceutical, health, psychologist, medical and dental services; recruitment; rehabilitation services; childcare services; plants; support animals; food and drink; petrol and transport; and entertainment, exercise and wellbeing services.

We acknowledge that our supply chain extends past our tier 1 suppliers and intend to gain further knowledge as to tier 2 and beyond in future reporting periods.

Criteria 3: Risks of Modern Slavery (MSA s16(1)(c))

Allambi Care understands that due to the nature and prevalence of modern slavery in the world every entity has risks of modern slavery within its operations and supply chains. Like every entity, we are considering the likelihood of risks that we could cause, contribute to, or

be directly linked to modern slavery practices so that we can then put appropriate actions in place to address any potential risks.

1.4 Operational risks

We acknowledge that some of our employees undertake shift work outside of regular working hours which can reduce the oversight an employee may have over staff. Some of our employees also work with vulnerable clients and that can have safety ramifications for our staff. We know from the literature that these factors can sometimes increase the vulnerability of a workforce. However, given the various policies and processes discussed below, we believe our employees are well protected and this aspect of our operations poses a low risk of modern slavery. We also note that 57.6% of our workforce are permanent employees, and that the certainty of these arrangements reduce the vulnerability of our staff. Many of our staff have asserted that they prefer casual working arrangements and the ability to have more flexibility over when they take shifts, though we do encourage staff to become permanent. One of our staff is on a visa. We are aware that migrant workers experience an increased vulnerability to exploitation.

We have learnt from the literature that perpetrators of modern slavery tend to target more vulnerable members of our society. For this reason, the very individuals that Allambi Care supports may be more likely to fall victim to modern slavery. We acknowledge that our industry has an important role to play in taking action in response to modern slavery risks. In this regard, the very core of our business involves empowering those in vulnerable circumstances and providing care and striving towards belonging, hope and positive futures. As such, we believe we are already well equipped with skills and knowledge that can assist in the battle to eradicate modern slavery.

1.5 Supplier Risks

We understand that businesses can contribute to or be directly linked to modern slavery practices through their own supply chains by conducting operations in a way that may facilitate or incentivise modern slavery, such as by placing unreasonable timing or budgetary pressures on suppliers, or simply by contracting with a supplier that is engaged in modern slavery practices.

Of our tier 1 suppliers, we believe most are located in Australia, which is a low-risk geographic location for modern slavery. We are in the process of mapping in detail the locations of each of our 856 suppliers. We acknowledge that we engage with suppliers of the following categories of goods/services that are identified in the literature as posing a higher risk of modern slavery: office furniture, stationery, blinds, carpets, timber, whitegoods, food and drink, information and technology goods/services, medical equipment, recruitment agencies, cleaning services and subcontracted repair/maintenance services. We are continuing to map our supply chains and seek to gain deeper understanding of any risks within same in future reporting periods.

We are aware that generally a supply chain that is subject to more frequent changes can be an indicator of less stable long-term supplier relationships which can increase the uncertainty for workers involved and may lead to a higher risk of modern slavery. As detailed above, our Direct Client supply chain has to be agile and flexible in order for Allambi Care to

provide the tailored services and care it does to the vulnerable individuals we support. We are aware that the interchangeable nature of these supplier relationships may be an area of higher risk for us.

1.6 COVID-19

We also acknowledge that in the reporting period the COVID-19 pandemic continued to have an impact resulting in some remote working, immobility, reduced oversight, substantial and unexpected change in supply and demand, loss of income, fear of loss of income and excessive overtime around the world. Allambi Care understand these are all factors that can considerably increase the vulnerability of any workforce to exploitation and as such the risks of modern slavery have risen as a result of the current pandemic. As the world has returned to face-to-face interactions in many locations, we acknowledge that many of the heightened risks created by the pandemic will continue to have an effect.

Criteria 4 and 5: Actions to Assess and Address Modern Slavery, Effectiveness (MSA s16(1)(d)- (e))

Allambi Care is seeking expert advice in the modern slavery space in order to progress its journey in this space in a meaningful way, aiming to continuously improve in future reporting periods.

1.7 Operational Actions

Our values include being:

- An organisation that provides high quality service improving outcomes for clients, and the community.
- An organisational culture that generates trust and enthusiasm at all levels, working together in an inclusionary and focused way.
- An organisation that champions acknowledgement – recognising first nations culture, history and diversity, and deep connections to, and custodianship of the land.
- An organisation that seeks and nurtures connection at all levels through effective partnerships and collaboration.
- An organisation that fosters innovation and sustainability by being courageous and resourceful.

We operate in the space of supporting vulnerable individuals and strongly believe our existing culture as embedded in these values is one that we believe is conducive to addressing and assessing modern slavery risks.

Policies and Processes

In relation to our own workforce, we have in place processes and policies which we believe will aid in addressing and assessing modern slavery in our operations including our Code of Conduct, Disciplinary Policy, Grievance Management Policy, Records Management and Privacy Policy, Equal Employment & Affirmative Action Policy and our Bullying Harassment & Discrimination Prevention Policy. We recognise that many of the topics covered in these policies can have overlay with modern slavery and that the absence of a good culture in

these areas can indicate the presence of modern slavery risks or may escalate into modern slavery in time.

We acknowledge that instances of modern slavery are often hidden in plain sight because the very nature of the crime means that victims or witnesses are powerless to come forward. Allambi Care has a Whistleblower Policy which is an important tool that assists Allambi Care in identifying unlawful activity that may not be uncovered unless there is a secure process to disclose any wrongdoing. This Policy ensures individuals who disclose wrongdoing can do so safely, securely, and with confidence that they will be protected and supported.

Many Allambi Care staff are mandatory reporters under various child safety legislation. This means we work in a field where we are trained and understand our obligations to look for any suspected harm and appropriately report any suspicions to authorities sensitivity and in a timely manner. We believe these skillsets and awareness levels will increase the ability of our staff to spot the signs of modern slavery and respond to same.

We have a number of other processes in place to protect our staff. All staff receive paid induction and role-specific training which includes:

- Structured supervision and access to mental wellbeing support;
- Award-aligned pay, penalties and wage progression;
- Mandatory compliance screenings and emphasis on workplace safety;
- Fair recruitment practices and an inclusive workplace culture.

Together, these measures create a robust framework that support both permanent and casual staff in delivering high-quality care while safeguarding their own rights, wellbeing and professional development.

1.8 Supply Chain Actions

We have a decentralised procurement team due to the unique work we do. Our Property Team manage most of the suppliers from an operational/asset perspective and then each caseworker coordinates individual suppliers for each of our clients, such as health appointments etc.

We have a contractor management system that we use to manage all information and documents relevant to our suppliers. We also maintain close relationships with our suppliers, we see many suppliers on a daily or weekly basis as they are regularly onsite, and other suppliers we meet with at 6 monthly intervals. We review many contracts on an annual basis. We understand the importance of maintaining these relationships and we go out of our way to action any issues or concerns. Our personnel are onsite regularly to check the quality of the work and conditions of goods being supplied and we receive feedback from staff in this regard more generally.

When screening for new suppliers, we tend to look for small family-owned businesses rather than bigger corporations and rely on word-of-mouth references also. We consider suppliers online profiles and reviews, and complete checks of qualifications, insurances etc. We work with our suppliers to give them detailed inductions into the workings of Allambi Care and our professional expectations, especially being onsite and around our vulnerable clients.

As above, we have started to compile a central list of suppliers with a view to mapping our supply chain based on risks related to geographic location and category of goods/services. We have already identified particular goods and services that we would like to focus on in future reporting periods, as well as understanding how the unique nature of our Supply Chain impacts our risks in this space.

We are working to build upon our approach to modern slavery with the help of external experts so that we can ensure we are able to assess the effectiveness of the actions we are taking in future reporting periods.

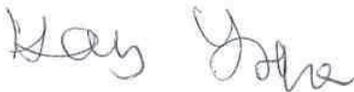
Criteria 6: Consultation (MSA s16(1)(f))

Given Allambi Care does not own or control any entities there is no inter-entity consultation required.

From Our Principal Governing Body

Allambi Care makes this Statement in accordance with section 13 of the *Modern Slavery Act* 2018 (Cth). Allambi Care's Board of Directors is the principal governing body for the purpose of the Act.

This Modern Slavery Statement was considered and approved of by the Board of Allambi Care.



Kay Fraser

17 December 2025

Managing Director

Responsible Member of Allambi Care's Principal Governing Body