

Endeavour Foundation

Modern Slavery Statement

For the year ended 30 June 2023



Acknowledgement

Endeavour Foundation acknowledges the traditional custodians of country throughout Australia. We pay our respects to them, their cultures, and Elders past and present. We acknowledge their continuing relationship to this land and the ongoing living cultures of Aboriginal and Torres Strait Islander peoples across Australia.

We also acknowledge the forced labour, servitude and enslavement of Aboriginal and Torres Strait Islander peoples and Pacific Islander peoples in Australia's history. We recognise the trauma and impact those injustices have had on individuals, their families, and communities.

We acknowledge the victims and survivors of all forms of exploitation that we recognise as modern slavery.

Introduction

For more than 70 years we have supported our country's most vulnerable to fight discrimination and overcome adversities to ensure that they can make their possibilities a reality. We support people to live their best lives and remove barriers that prevent people from exploring and realising their potential — whether it's living independently, getting a job or engaging in the community.

Endeavour Foundation has an important role in addressing modern slavery within our sphere of influence. We recognise our obligation to protect and advance human rights as a purchaser of goods and services. This work is strongly aligned to our values, and our modern slavery work is another means to progress the cause of human rights.

In our fourth Modern Slavery Statement, we are pleased to report that over the past year we have continued to build on the initiatives completed in prior years. For too many people, human rights remain far from guaranteed. For that reason, the Endeavour Foundation continues to work for a future where human rights of all people are protected and valued equally.

David Swain, CEO

Statement overview

Endeavour Foundation ABN 80 009 670 704 is a reporting entity under the *Modern Slavery Act 2018*. This statement covers activities of Endeavour Foundation, and its controlled entities, for the period 1 July 2022 to 30 June 2023. It outlines the steps Endeavour Foundation and its controlled entities took to address modern slavery risks, including the governance processes and progress we made in FY23.

The sections of the Statement outlining our mandatory reporting criteria required by the *Modern Slavery Act 2018* are set out in the table on the next page.

Endeavour Foundation

Modern Slavery Statement

For the year ended 30 June 2023



Mandatory Reporting Criteria	Section
Identify the reporting entity	Reporting entities, see page 1
Describe the reporting entity's structure, operations and supply chains	Organisation structure, operations and supply chain, see pages 3, 4 and 6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Risks of modern slavery in our operations and supply chains, see page 6 to 9
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls, to assess and address these risks, including due diligence and remediation processes	Actions taken, see page 7 Remediation, see page 10
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Assessing effectiveness, see page 9
Describe the process of consultation with any entities the reporting entity owns or controls	Consultation, see page 11
Any other relevant information	Looking forward, page 10

Our organisation

On 14 June 1951 a group of parents committed to creating educational options and opportunities for their children with intellectual disability and started a makeshift school on the veranda of a home in Brisbane. Endeavour Foundation was founded on the principle that people with an intellectual disability have the same rights as everybody else, starting with the basic right to an education.

Today, as an independent, not-for-profit organisation, we are at the heart of local communities – offering choice, opportunities, and personalised support to more than 21,000 people across Australia.

We collaborate with people we support to help make their possibilities a reality - at home, at work, through education and training and in the community.

For more information about our organisation, please refer to our [Annual Reports](#).

Endeavour Foundation

Modern Slavery Statement

For the year ended 30 June 2023



Our organisational structure

Endeavour Foundation (ABN 80 009 670 704) is a not-for-profit organisation, incorporated as a public company limited by guarantee and domiciled in Australia. Endeavour Foundation is a Registered Charity with the Australian Charities and Not-for-Profits Commission (ACNC). Endeavour Foundation's registered office is 33 Corporate Drive Cannon Hill, Queensland 4170.

The Endeavour Foundation controls three (3) entities which are incorporated in Australia and registered with the ACNC. They are:

- Endeavour Foundation Disability Research Fund Limited as trustee for the Endeavour Foundation Disability Research Fund Trust
- Community Solutions Group Limited
- BRACE Education, Training & Employment Limited

Our governance framework

A Board of Directors, both elected and appointed, govern the way we operate. They provide a balance of corporate expertise and lived experience of disability. The following Board committees assist with providing governance oversight:

- Audit, Finance, Risk & Compliance Committee
- Client Services Committee
- People and Culture Committee.

Endeavour Foundation's governance arrangements are set out in our Constitution. In addition, all Directors, Executives, and employees are required to meet standards of conduct and behaviour set out in our Code of Conduct.

Endeavour Foundation overview

Our purpose: Help people make their possibilities a reality. With CARE, IMAGINATION, ONE and PASSION as our core values, we use our resources, experience, and skills to reach more people and support them in more ways, for over 70 years. We're committed to providing opportunities for positive change. Whether through pathways to employment, or specialist support to access the services or tools people need to navigate a challenging world – we walk with the people we support on their pathway to possibilities.

Endeavour Foundation

Modern Slavery Statement

For the year ended 30 June 2023



Our Executive Leadership Team includes the CEO and leaders accountable for:

Division	Description
Community Solutions Group	Community Solutions provides individualised solutions that empower people to live their best life through our innovative Employment Services, Education and Training and NDIS Specialised Services.
Home and Community	Provides our clients with accommodation services including supported independent living solutions, in-home support, transport solutions, community support through our living and lifestyle centers.
Work	Provides employment solutions for clients through four (4) key pathways: Disability Social Enterprise; Supported Hosted Employment; Supported Independent Employment and Mainstream employment.
Fundraising, Advocacy, Marketing and Engagement	Protect, manage, and grow the reputation of Endeavour Foundation. Deliver stakeholder communication, policy advocacy initiatives and campaigns, engagement activities and high-profile events.
Legal and Governance	Provides in-house legal support, delivers fit for purpose policies, procedures and guides relating to risk, assurance, compliance, privacy, quality, organisational strategy & planning and project management, maintains the organisation's document management system and manages the insurance program.
People and Wellbeing	Supports the organisation in all aspects of Human Resource management including talent acquisition; remuneration, benefits and payroll, work health and safety, learning and development, employee relations, employee experience, and organisational change.
Finance, Infrastructure & Lotteries	Supports the organisation in all aspects of financial management, procurement, property development, asset maintenance and construction, fleet management, and information, communications and technology. Overall responsibility for our charitable lottery program.

To learn more about our governance framework, visit our website, [About Us](#).

Endeavour Foundation

Modern Slavery Statement

For the year ended 30 June 2023



Our values, code of conduct and policies

Our values, Code of Conduct and policies set our behavioral standards and provide guidance for anyone who works at Endeavour Foundation.

All employees are responsible for knowing the ethical, legal, and policy requirements that apply to their jobs and reporting any suspected breaches of law or our code.

Our executives and leaders are accountable for creating and promoting a workplace environment in which compliance and ethical conduct are expected.

Our values

Our values describe what we stand for and guide the way we do things. They are an integral part of how we represent ourselves.

We share and live these values which convey a genuine, trustworthy, and honest face of our organisation. We have four core values:



We are one, valuing individual strengths and experience so we can achieve more together.

Our clients are at the centre of everything we do. We consider the impact for the client when making decisions or taking action.

We collaborate with each other to achieve business imperatives and support our colleagues to achieve their best. We use a 'co-create co-deliver' approach to new initiatives or changes.

We trust and respect each other, actively seeking out and valuing feedback and diverse views. We choose 'Above the line' behaviours including accountability, responsibility, and ownership.



We never stop imagining a better future for our customers.

We always imagine a better way and are courageous in challenging the status quo. We challenge 'myths' and appreciate diverse and 'out of the box' ideas.

We focus on possibilities and work to remove barriers to achieve them. We see challenges as opportunities for growth.

We make it easy to do business with us and with each other.



We care and treat everyone with respect and kindness.

We genuinely care for customers and our people as unique and diverse individuals. We are genuine, honest, and transparent in our conversations and actions.

We value each other and actively seek out and recognise those who have made a difference. We celebrate success – achievements, milestones, and small wins. We surprise and delight.

We take time to understand the ideas and needs of others, choosing to reflect and refocus our behaviours and efforts in order to achieve the best outcome for our customers and the business.

Endeavour Foundation

Modern Slavery Statement

For the year ended 30 June 2023



We are passionate, our customers are at the heart of everything that we do.

We are passionate about the customer experience and strive to make their possibilities a reality by removing barriers and supporting them to focus on the things that matter.

We take action and deliver on our promises. We do what we say we'll do when we say we'll do it, and we are agile in our approach.

We know that our mood is contagious, and we bring our best selves to work every day, choosing positivity, enthusiasm and a solutions focus. We have fun.

Code of conduct

Our Code of Conduct guides our actions, words and behaviours. It helps us take a consistent approach to ethical, legal and compliance issues. We require everyone – our Board, CEO and leadership teams, staff, and volunteers – to abide by our Code of Conduct.

Our code is underpinned by the National Disability Insurance Scheme (NDIS) Code of Conduct that promotes safe and ethical service delivery.

Policies

Our policies cover many important elements about how we work, including key elements on behaving ethically and lawfully.

Policies and procedures outline key responsibilities and actions. They are regularly reviewed to ensure they align with best practice and all relevant regulatory requirements.

Our supply chain

Endeavour Foundation takes our partnership with suppliers very seriously. This enables us to make more informed purchasing decisions to progress the eradication of modern slavery throughout our supply chain.

Our assessment of approximately 2,500 suppliers with an annual spend over \$100 million has shown us that over 95% of our suppliers are Australian based, while less than 100 are based overseas. More than 80% of our procurement spending is concentrated on our largest 107 (4.2%) suppliers.

The diversity of the products, markets and regulatory requirements associated with these purchases can potentially expose Endeavour Foundation to many risks.

To help us make more informed purchasing decisions, we will continue to refine our approach to assess any modern slavery risks within our supply chain as part of our selection and contract renewal process. We work with our suppliers to assess whether they are meeting our standards using a combination of:

- due diligence activities such as desk top research, questionnaires, and documentary review
- signed contracts with 'high risk and valued' suppliers, formalising their responsibilities and liability to comply with the Modern Slavery Act and to take reasonable steps to

Endeavour Foundation

Modern Slavery Statement

For the year ended 30 June 2023



ensure that there is no modern slavery in their supply chains or in any part of their business.

Modern slavery risk for the Endeavour Foundation

The “risks of modern slavery” means the potential for the Endeavour Foundation to cause, contribute to, or be directly linked to modern slavery through its operations or supply chains – in other words, risks that Endeavour Foundation may be directly or indirectly involved in modern slavery.

The identification, analysis, and management of modern slavery risk:

- falls within our broader approach to human rights risk, and
- is assessed and managed consistent with our established enterprise-wide risk management framework.

Modern slavery includes trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. In identifying our modern slavery risks, we recognise organisations may directly or indirectly cause or contribute to adverse human rights, including in their operations and supply chain.

Endeavour Foundation’s risks of involvement in modern slavery are set out below:

1. Supply Chain - there is a risk that we could purchase goods or services which involved modern slavery in their creation or provision; and
2. Operations - there is a risk that labour could be exploited within our workforce.

Risks in our Supply Chains

As a purchaser of goods and services, we recognise there is a risk that we could indirectly be involved in modern slavery.

We recognise that these risks in our supply chain may be higher for certain goods and services that are manufactured in, or use materials sourced from, countries that are at a higher risk of having modern slavery practices. However, we also recognise that modern slavery risks exist across local Australian supply chains, particularly in smaller organisations.

We have analysed our spend and have identified the following high risk spend categories.

Building and Construction

There is a risk new capital building projects that expand the services of Endeavour Foundation contributes to:

- *modern slavery through overseas supply chains providing building and construction supplies;*
- *modern slavery, deceptive recruiting or debt bondage, through the use of unskilled, temporary or seasonal labour in the building and construction process.*

Endeavour Foundation

Modern Slavery Statement

For the year ended 30 June 2023



The building and construction industry commonly involve long supply chains utilising base skilled workers which can create risks of modern slavery. In addition, building materials are often sourced from countries that have a higher risk of modern slavery occurring. The building and construction process can be complex using a wide range of suppliers, with different supply chains. In addition, it often involves multiple work streams and numerous short-term engagements, all of which can increase the risk. As a result, there is a risk that Endeavour Foundation may indirectly contribute to modern slavery through the construction or fit out of new homes or other facilities from which it provides services.

ICT Hardware

There is a risk in acquiring ICT hardware Endeavour Foundation contributes to modern slavery through overseas supply chains.

Information and communication technology (ICT) hardware is a high-risk category, given manufacturing often occurs in higher risk modern slavery geographies. There is a risk that Endeavour Foundation may indirectly contribute to modern slavery practices through the purchase of electronic devices, including computers and mobile phones.

Textile Products

There is a risk in acquiring textile products for use in the provision of Endeavour Foundation services, Endeavour Foundation contributes to modern slavery through overseas supply chains.

Textiles, such as uniforms, sheets and towels are often produced in countries with higher risks of modern slavery. There is also a risk the products are manufactured from raw materials such as cotton, which is produced in countries where workers are at a higher risk of modern slavery. There is a risk that Endeavour Foundation may indirectly contribute to modern slavery through its purchase of textile products which it uses in the provision of its services.

Cleaning Products and Equipment

There is a risk that in acquiring cleaning products, personal protective equipment and machinery for use in social enterprises for use in the provision of Endeavour Foundation services, Endeavour Foundation contributes to modern slavery through overseas supply chains.

Cleaning products, personal protective equipment (PPE) and machinery can be produced in countries where there is a higher risk of modern slavery practices. In particular rubber products, such as gloves, are known to be a high-risk item given rubber is farmed in countries where workers have been known to be subject to modern slavery. There is a risk that Endeavour Foundation may indirectly contribute to modern slavery practices through the procurement of these items.

Endeavour Foundation

Modern Slavery Statement

For the year ended 30 June 2023



Risks in our Operations

We recognise there is a risk of modern slavery in our operations. This has been assessed as being a low risk, most staff are employed directly and on permanent or fixed term contracts. This lowers modern slavery risks within our direct workforce.

Endeavour Foundation was built on the principle that everyone should have the same rights and is committed to protecting and treating its employees fairly. As a result, there are several processes and policies in place to protect human rights within its operations. These include employment contracts and enterprise agreements and specific policies to ensure the fair and equitable treatment of all employees and clients.

Endeavour has made additional commitments through the investment in establishing and operating a dedicated safeguarding team and separate health and safety team. These individuals are committed to ensuring the ongoing safety and wellbeing of our staff and clients.

In our broader workforce, we use agency or labour hire arrangements and recognise that labour hire may carry a higher risk of modern slavery due to the higher rate of migrant workers and competition causing pressure to minimise costs. Work has commenced on reducing the level of agency usage and we will work with our suppliers to reducing risk in this area.

Risk management and due diligence

Given the risks outlined above Endeavour Foundation's key modern slavery risk area is the ability to identify suppliers, who cause, contribute to, or are directly linked to, modern slavery. To address this key risk area, we continue to develop our Supply Chain Assurance program to reduce our exposure to modern slavery risk through improved risk assessment, due diligence, and remediation processes.

Whilst we recognise that modern slavery risks may occur, we also know that the level of risk is influenced by factors such as vulnerable populations, product and service category, industry, and geographic location. Accordingly, we have tailored our risk processes to ensure that we focus our efforts on those areas that present an elevated risk of exposure.

Endeavour Foundation's procurement policy provides consistency and control over procurement activities and helps ensure the products and services we purchase will meet our duty of care and safety obligations.

Our effectiveness

We assess our effectiveness in identifying and managing modern slavery risks by tracking the progress of our initiatives and engaging with suppliers. Our modern slavery risk management action plan and due diligence processes are reviewed regularly as part of our risk management framework requirements.

We also recognise the challenge in assessing the effectiveness of our initiatives due to the complexity of modern slavery and that many of the risks may exist deep in our supply chains, where our visibility and ability to influence suppliers is limited.

Endeavour Foundation

Modern Slavery Statement

For the year ended 30 June 2023



We are committed to taking a continuous improvement approach to our commitment to reduce modern slavery risks in our operations and supply chains.

Remediation

While we have not identified any incidents of modern slavery, we do have reporting mechanisms.

Endeavour Foundation has incident reporting mechanisms that are part of our wider governance frameworks for managing risks. We also have a Whistleblower Policy, and an external third party has been engaged to receive any whistleblower concerns. Reporting can also occur on an anonymous basis.

Training

We continue to build the awareness of global modern slavery and helping the organisation to better understand, identify and report incidents.

We will invest time and resources to build our people's understanding of international standards of human rights, including modern slavery of those in our supply chain, and their capability to implement appropriate solutions to address risks.

Our achievements

Since the publication of our first Modern Slavery Statement in March 2021 we have:

- reviewed Endeavour Foundation's first Modern Slavery Policy;
- improved the identification of modern slavery risks in our supply chain;
- made it an ongoing requirement for key suppliers and commercial customers to complete our modern slavery questionnaire;
- responded to our commercial customers to meet their modern slavery requirements.
- incorporated modern slavery due diligence into our contracting processes;
- established key performance indicators to monitor effectiveness of modern slavery actions;
- identified and actioned gaps through our supplier questionnaire; and
- worked with suppliers to address modern slavery risks.
- Successfully completed a SEDEX¹ (Supplier Ethical Data Exchange) full audit at our Mt Druitt site with favourable results.
- SEDEX vetted Annual Supplier Assessment Questionnaire (SAQ) conducted over five (5) sites

¹ Sedex's vision is to drive organisations globally to improve the lives of the people they impact. SEDEX believes every person working in the supply chain should have equality, a safe place to work, and the means to support themselves and their families, free of bribery and corruption, using sustainable methods that keep the environment intact for future generations.

Endeavour Foundation

Modern Slavery Statement

For the year ended 30 June 2023



Looking to the future

Endeavour Foundation acknowledges a continuous improvement process is required to increase the transparency of our suppliers and their suppliers, to identify and eradicate modern slavery risks through our Supply Chain Assurance Program.

Our focus is based on continual improvement and to cement our modern slavery obligations into our current processes systems and methodologies that support a slavery free world.

Our current focus includes:

- Reviewing, updating, and improving Endeavour Foundations **complaints management systems** in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs).
- Developing policies, process, and systems in accordance with the **Child Safe National Principles** to enable Endeavour Foundation to be recognised as a Child Safe organization.
- Building on our procurement processes that includes **due diligence processes** for organisations intending to work with Endeavour Foundation which must be completed prior to onboarding, contract award or contract renewal.
- **Developing a risk-based due diligence process** to determine the level of due diligence required based on the level of risk our suppliers pose, associated supply chain risks and human rights risks with reference to the UN 'Protect, Respect and Remedy' framework and UN Guiding Principles on Business and Human Rights.
- We **work with suppliers** to resolve or substantially mitigate issues, rather than simply ending the relationship with the supplier, because of the potential adverse impact on the livelihood of the supplier's employees.

Consultation with Controlled Entities

This statement covers activities of Endeavour Foundation, and its controlled entities. In preparing this modern slavery statement Endeavour Foundation consulted its controlled entities in the development of this statement. The directors and officers of all these entities were consulted and provided with an opportunity to review the statement prior to its approval by the Board of Endeavour Foundation.

A handwritten signature in black ink, appearing to read 'E. Jameson', written over a horizontal line.

Signed _____

Name Elizabeth Jameson

Position Endeavour Foundation Board Chair

Dated 30/11/23