

Modern Slavery Statement

Reporting Period 1 July 2023 – 30 June 2024



A Message from the Leadership of New Horizons

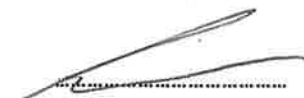
At New Horizons, we are unwavering in our commitment to upholding the human rights of our people and the broader community. This dedication extends to actively combatting modern slavery within our operations and supply chains. We act ethically and with integrity at every level, ensuring business pursuits and core values go hand-in-hand. As a result, we are proud to report that the risk of modern slavery in our supply chain and operations has remained low during this Reporting Period. The reasons for this assessment are outlined in further detail in this Statement.

We understand the importance of vigilance in identifying and addressing potential instances of modern slavery. Since its inception, we have matured the implementation of our Modern Slavery Framework across the organisation and reviewed the processes put in place in previous years to address these concerns. However, we recognise that the landscape is constantly evolving, and we remain committed to continuous improvement in our assessment and mitigation strategies.

For over 55 years, New Horizons has been dedicated to improving the well-being of thousands of individuals. As we continue to grow and evolve, our dedication to ethical business practices and the fight against modern slavery will remain at the core of our organisational values. We are constantly seeking opportunities to provide essential services where others are unable to, and in doing so will continue to be transparent in our efforts.

We could not do what we do without our amazing people. I extend my sincere thanks to our staff, partners, and peers who work tirelessly alongside us to prioritise our clients and community, aiding in our ongoing commitment to ending modern slavery practices.

Luke Buckley
Chief Executive Officer



28 October 2024

Peter Howell
Chair of the Board

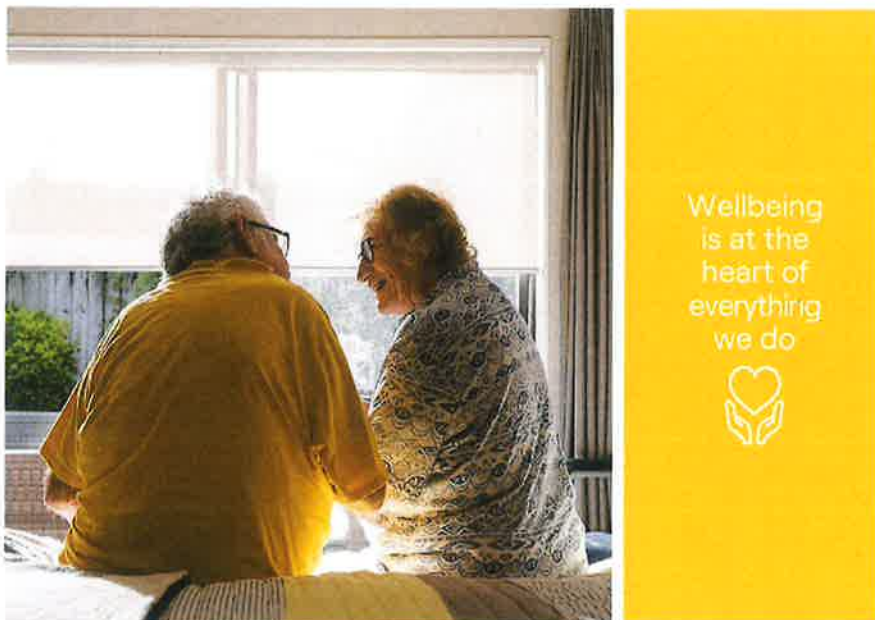


28 October 2024

1. Overview

The *Modern Slavery Act 2018* (Cth) mandates that organisations with consolidated annual revenues exceeding \$100 million submit an annual statement, known as the Modern Slavery Statement. This is New Horizons Enterprises Limited's (ACN 002 066 604) fourth Modern Slavery Statement which covers the reporting period from 1 July 2023 to 30 June 2024 (Reporting Period).

We recognise that some of the people who work in our supply chain may be vulnerable to exploitation and abuse creating devastating social impacts on communities. We do not condone any form of Modern Slavery, which includes forced labour, human trafficking, debt bondage, child labour, and other practices that deprive people of their freedom and dignity.



We are committed to actively upholding human rights of our people and also the broader community by acting ethically and with integrity to combat Modern Slavery within our operations and supply chains. This Statement sets out New Horizons' efforts to date to identify, assess and mitigate modern slavery risks within our operations and supply chains, including collaborating with suppliers who align with our values.

A handwritten signature in black ink, appearing to be a stylized name.

While we believe our direct impact related to modern slavery practices during the Reporting Period was minimal, we remain focused on a continuous improvement approach to strengthen our modern slavery response and practices, guided by the principles outlined in the United Nations Principles on Business and Human Rights to ensure we are actively protecting peoples' rights and safety.

2. Structure Operations and Supply Chain



Who are we?

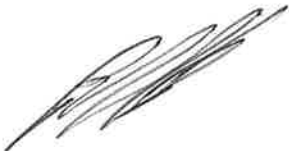
New Horizons is the reporting entity for this Modern Slavery Statement.

New Horizons is an Australian public company limited by guarantee. New Horizons is a standalone entity and does not control any other entities.

For over 55 years, New Horizons has been committed to the improvement of the rights and wellbeing of thousands of vulnerable and disadvantaged people. We specialise in disability and mental health services and aged care. Our vision is for happy, inclusive communities who work collaboratively to create opportunity and improve quality of life. Our programs and services as a collective help us to achieve this vision.



Work with us to create a world with room for everyone.



Operations

New Horizons' Head Office is located at 15 Twin Road, North Ryde, NSW Australia 2113. New Horizons also has several offices located throughout New South Wales.

New Horizons' operations remained predominantly unchanged since the last reporting period. We continued to operate across NSW and Queensland and directly employ staff in Australia.

- **Direct Employment of Employees**

New Horizons employed 1,186 staff as at 30 June 2024.

- **Provision and Delivery of Services**

During the Reporting Period, New Horizons continued to grow as an organisation that, across New South Wales and Queensland, provides advice, support and connections to our customers through a comprehensive range of services including:



Besides offering wellbeing services, we continued to operate a number of other businesses and brands including:

- **Wellbees** – the bee frame company.
- **Packable** – a one stop shop for any packing needs.
- **i.am** – psychosocial service supporting young people to identify their hopes and reach their future goals.
- **headspace** – free and confidential service where young people aged 12-25 and their families can access support for their mental health.

Our customers continue to be people with a disability, mental health concerns, the aged, the youth, people at risk of homelessness and Indigenous Australians.



Opening of the Barista Brunch Bar

During the Reporting Period, New Horizons started a new initiative called the 'Barista Brunch Bar' (also known as BBB) – a mobile food truck located at New Horizons' Head Office.

BBB is operated by New Horizons in conjunction with Double Roasters and BBB provides coffee as well as meals and snacks for breakfast, lunch and brunch. In addition, BBB also offers event catering services.

The initiative was created with the ethos of being a local café that encourages rapport in the community.

All profits generated by BBB are reinvested into New Horizons to support its community-based services in line with our charitable purpose as a not-for-profit organisation.

Aged Care Facility

In April 2023, New Horizons closed its only Aged Care Facility located at 53- 63 Badajoz Rd, North Ryde, NSW 2113. Despite the closure of this facility, New Horizons continues to provide support services to the aged through independent living support services, inclusion services and medical and specialist services.

Supply Chain

New Horizons procured goods and services from over 500 suppliers during the Reporting Period. The geographic composition of New Horizons' suppliers in this Reporting Period remained largely similar to the previous Reporting Period, with 99% of suppliers based in Australia.

New Horizons' suppliers can be divided into two main categories: Trade Suppliers and Non-Trade Suppliers. Some of the goods and services procured from our suppliers are set out in the table below.

Trade suppliers	Non-trade suppliers
Consumables	IT and technology
Manufacturing	Human resources
Professional medical & health services	Marketing
Facility management	Professional corporate services including legal and accounting
Furniture and equipment	Property services
Motor vehicle hire and purchase	Office operations
Maintenance and repairs	
Customer support	

Overseas suppliers

Goods and services procured during the Reporting Period were sourced from only a small number (1%) of suppliers located overseas.

New Horizons' overseas suppliers during the Reporting Period were located in:



- United States
- Canada
- Ireland
- New Zealand
- United Kingdom
- Czech Republic

Two of New Horizons' top 20 suppliers (in terms of spend), are headquartered in the United States. The main goods and services procured from overseas suppliers during the Reporting Period related to IT software and Human Resources Software.

3. Our modern slavery risks

We have undertaken an assessment of modern slavery risks within our operations and supply chains during the Reporting Period to identify instances where we are or potentially could be, directly or indirectly, linked to modern slavery practices. We have assessed the risk of modern slavery in our supply chain and operations remained low during the Reporting Period for the following reasons:

- the large majority of our direct suppliers (99%) are based in Australia and are required to comply with Australian labour laws and practices; and
- the small number of our overseas suppliers are based in countries that have modern slavery laws and stronger labour laws in place;
- the goods and services procured within our direct supply chain and operations are generally considered low risk as explained further in this section; and
- we have assessed the charity and health and wellbeing sector in which we operate as having a low modern slavery risk, as detailed in this section.

We acknowledge that New Horizons is not immune to the risks of modern slavery practices occurring within our supply chain and operations.

Given the nature of New Horizons as a large charity with limited resources, the ability to examine our risks beyond our first-tier suppliers remains a challenge in identifying modern slavery risk further 'down-stream', within our second and third tier supply chains. Despite this, we are cognisant that we may be indirectly linked to modern slavery practices further down our supply chain as described below.

Geographic risk level: Low

We have assessed the geographic risk associated with modern slavery practices to be low during the Reporting Period given that 99% of our suppliers were based in Australia. All our overseas suppliers are located in developed countries where there is a strong rule of law and protection of human rights, with countries such as Canada, United Kingdom and the United States of America also imposing reporting obligations in relation to Modern Slavery.

We have reviewed the location of our overseas suppliers against the Global Slavery Index and highlight that all the overseas suppliers engaged by New Horizons are based on countries that are considered to be at lower risk of modern slavery.

New Horizons does not directly procure goods or services from suppliers based in countries where there is a prevalence of modern slavery as shown in the graphic below. New Horizons understands that the lack of visibility in certain overseas markets carries additional risks of modern slavery especially in second and third tier levels of our chain.

Country	Prevalence (per 1,000 people)	Vulnerability (out of 100)
Australia	1.6	7
United States	3.3	25
New Zealand	1.6	8
Canada	1.8	11
United Kingdom	1.8	14
Ireland	1.1	9
Czech Republic	4.2	13

(Global Slavery Index, <https://www.walkfree.org/global-slavery-index/map/>)



Sector and industry risk level: Low

New Horizons operates in the Not-For-Profit sector and its services touch on a variety of other sectors including the healthcare, disability, aged, youth, housing and property sectors. As these sectors are heavily regulated in Australia, this generally allows for greater visibility over lower tier suppliers and as such, we consider our sector and industry level risk remained low during the Reporting Period.

Notwithstanding this, New Horizons acknowledges that it may be linked to modern slavery practices of suppliers further down our supply chain in instances where second and third tier suppliers:

- operate in the technology manufacturing sector where vulnerable populations (typically low paid, low skilled workers) are used in mineral extractive operations and the assembly of electrical components and equipment of such products; and
- operate in the cleaning and maintenance sector which disproportionately engages workers from migrant backgrounds with English as their second language and low socioeconomic status.

Product and services risk: Low

As part of New Horizons' operations, we predominantly rely on our non-trade suppliers for services such as cleaning, electricity, technology and general office and property maintenance.

New Horizons acknowledges that the nature of these services often involves suppliers engaging external contractors who are more likely to be of culturally diverse backgrounds and hold temporary work or immigration visas. While, New Horizons has assessed its product and services risk as remaining low in the Reporting Period, we acknowledge that the nature of these services which increases the risk of being linked to modern slavery practices.

Supply chain model risks: Low

Based on the information available to us, our supply chain model risk has been assessed as remaining low during the Reporting Period. We have a large and complex supply chain with over 500 suppliers during the Reporting Period. Given our limited resources and the complexity of our supply chain, it is difficult to monitor the modern slavery practices of our direct and indirect suppliers which increases the risk that New Horizons may be linked to

modern slavery practices.

We have continued to mitigate this risk through our due diligence efforts explained further in section 4 of this Modern Slavery Statement.

4. Our action

Due Diligence

New Horizons remains committed to eradicating instances of modern slavery within our business operations and supply chains.

New Horizons recognises the challenges that come with tracing suppliers in complex supply chains, which is why we conduct due diligence with our suppliers prior to engaging in new contracts. We acknowledge that our annual Modern Slavery Statement is only one step in a broader effort to prevent modern slavery practice in our organisation and this requires ongoing vigilance.

Throughout the Reporting Period, New Horizons continued to employ our established due diligence procedures to identify and evaluate potential instances of modern slavery within our internal processes and extended supply network. These processes include:

Our internal screening processes:		
Obligation for suppliers to disclose Modern Slavery Statement	Compliance with the modern slavery provisions in our standard Terms and Conditions	Tender processes that focus on factors other than price
We require suppliers that are subject to the Modern Slavery Act 2018 (Cth) to provide us with their modern slavery statement. Analysing a prospective supplier's disclosure on modern slavery enables New Horizons to gauge a supplier's perception of their own risks and preparedness to tackle modern slavery threats.	Where a supplier is not required to report on its modern slavery risks, or it chooses not to report voluntarily, New Horizons requires those suppliers to comply with our Standard Terms and Conditions which obliges the supplier to avoid engaging in modern slavery and to report to New Horizons within 30 days of any instances of modern slavery within their own operations and supply chain.	New Horizons adopts a paired comparison method when assessing suppliers as part of a tender process. Suppliers are ranked internally according to multiple criteria and price is often not the priority when making this assessment. As a charitable organisation, New Horizons must ensure that any proceeds are expended ethically and transparently.

Supplier Agreements

We continued to roll out our Supplier Agreement to all new suppliers during the Reporting Period. The Supplier Agreement includes specific provisions on modern slavery. It requires a supplier to acknowledge that it has no knowledge of modern slavery in its own operations or supply chain and that it will take reasonable steps to identify the risk of and prevent the occurrence of modern slavery in its operations and supply chain.

Subcontractor Statement

We also require all our sub-contractors to complete a sub-contractor statement to ensure that people employed by our sub-contractors are paid superannuation in accordance with Australian employment legislation.

Combatting Modern Slavery Policy

We continue to conduct business in accordance with our *Combatting Modern Slavery Policy*, which describes New Horizons' strategy towards modern slavery, the management of associated risks within our business and supply chain, alongside our proactive measures to mitigate such risks.

Supplier Code of Conduct

Our Supplier Code of Conduct has been in place for over a year now and sets out New Horizons' expectation that its suppliers:

- operate in full compliance with all laws and industry standards in which they do business;
- assist in the provision of information regarding modern slavery to New Horizons;
- provide a true and accurate account of their operations and supply chain;
- have processes in place for workers to report non-compliance with New Horizons' Supplier Code of Conduct anonymously and free of retribution; and
- remedy any non-compliance with New Horizons' Supplier Code of Conduct as a matter of priority.

We are diligently working on establishing and refining systems to monitor and manage the risks associated with modern slavery in our operations and supply chain, recognizing that this initiative is in its formative phase and is a continuous endeavour.

As part of our efforts to improve transparency of our operations and supply chain in the upcoming reporting period, we are planning to provide training and education on modern slavery to all our staff and require all new suppliers to complete a modern slavery questionnaire before engagement, as explained further in section 7 of this Modern Slavery Statement.

Grievance and Remediation

New Horizons recognises that our influence over larger suppliers that are potentially linked to modern slavery practices is constrained by the scale of our operations. Nonetheless, we are dedicated to collaborating with suppliers to address and lessen any negative consequences, as well as to prevent future occurrences of modern slavery with our own supply chain and those of our suppliers.

Since the last reporting period, there has been no significant change to the measures we have implemented concerning our grievance and remediation processes. We acknowledge that developing effective grievance and remediation mechanisms for individuals impacted by modern slavery and human rights violations represents a focus area of improvement within our modern slavery approach.

During the Reporting Period, New Horizons' Integrity Hotline service remained accessible to all present and past employees, volunteers, contractors, suppliers of New Horizons, and their family members. The hotline provides a confidential and anonymous platform for reporting any unethical or illegal activities, including modern slavery practices and other violations of human rights.

Throughout the Reporting Period, there were no reports of modern slavery made to the Integrity Hotline. We urge all individuals associated with our operations to utilise this service with assurance, knowing that all reported incidents will be regarded with utmost seriousness, maintained in confidence and thoroughly examined.

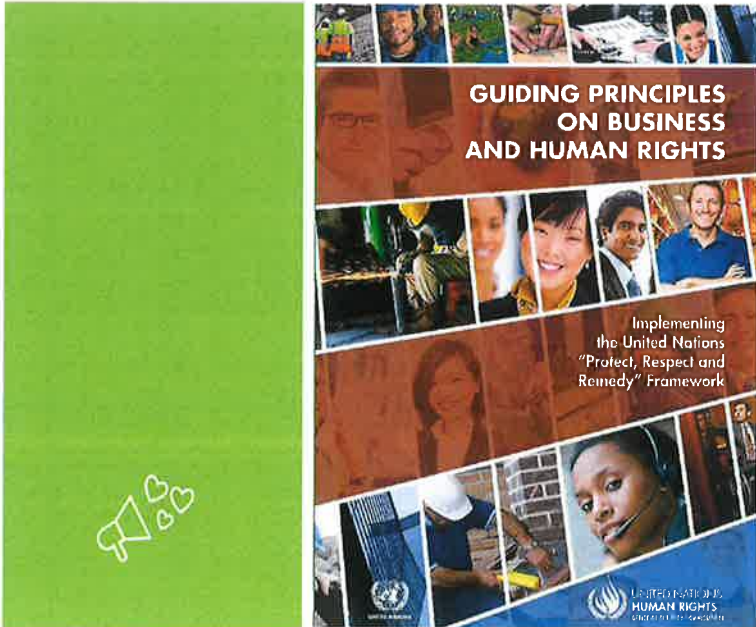
5. Assessing the effectiveness of our action



There has been no significant change since the previous reporting period in relation to our monitoring and reporting program to assess the effectiveness of our actions. During this Reporting Period, our strategic priorities focused on gaining a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains as evidenced by our ongoing due diligence processes.

New Horizons recognises that the ability to assess the effectiveness of our actions is an area that needs to be afforded greater attention, and which will in turn help our organisation to develop a more robust modern slavery framework. This is especially important as our business grows and we engage new suppliers from various regions, and the risks of modern slavery occurring in our supply chain and operations evolve.

We remain committed to upholding the due diligence principles set out in the United Nations Guiding Principles on Business and Human Rights. As we look to develop our internal processes and procedures in this space, we acknowledge the importance of implementing processes that combine both qualitative and quantitative indicators to better understand the effectiveness of our initiatives.



6. Process of consultation

Consultation was not necessary in the preparation of our Modern Slavery Statement for this Reporting Period as New Horizons is a standalone entity.

7. Other relevant information

Our commitment to developing our due diligence, grievance, and remediation processes, as well as the tools for evaluating the impact of our efforts, is an ongoing process. Despite the challenges we encounter as a not-for-profit organisation with limited resources and funding to allocate to modern slavery, we persist in our endeavors to address modern slavery to the fullest extent possible.

Key areas of action for the next reporting period

Our focus areas for the upcoming reporting period remain the same as the initiatives we had in place for the current Reporting Year.

These initiatives will assist in fortifying our protocols to identify and assess the risk of slavery throughout our supply chain and operations.



They include:

Suppliers due diligence



Continue to develop our supplier due diligence by implementing a supplier modern slavery questionnaire.

Raise awareness of modern slavery across our business



Implement training to our employees to help them understand how to identify, assess and mitigate modern slavery risks.

Continue to develop grievance & remediation mechanisms



Obtaining advice to map out a plan for developing a robust and effective grievance and remediation mechanism.

Statement from New Horizons' Board Chair

This Modern Slavery Statement for the Reporting Period 2023 – 2024 was approved by the Board of New Horizons Enterprises Limited (ACN 002 066 604).

Signed: _____

Peter Howell
Chair of the Board

Date: _____



For queries relating to this statement:

General Manager
Enterprise Risk and Business Assurance
legal@newhorizons.org.au



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