Modern Slavery Statement

Reporting Period 1 July 2025 – 30 June 2026

A Message from the Leadership of New Horizons

At New Horizons, our commitment to human rights is reflected in how we deliver services, employ our people and engage with suppliers and partners. We recognise that modern slavery can occur in complex and hidden ways across both local and global supply chains, including through subcontracting, labour supply and recruitment arrangements.

As an organisation supporting people living with disability, people experiencing mental health challenges, older Australians, young people and others experiencing disadvantage, we have a particular responsibility to act with integrity, transparency and respect for human dignity.

During the 2025–26 Reporting Period, New Horizons continued to assess and manage modern slavery risks across its operations and supply chains.

Our assessment indicates that the overall risk of modern slavery within our own operations and direct supply chain remains low. However, risk is not static. We recognise that modern slavery risks may exist beyond our immediate suppliers, particularly where global supply chains, subcontracted labour, recruitment intermediaries or limited visibility into lower-tier suppliers are involved.

We remain committed to strengthening our approach through proportionate supplier due diligence, clear contractual expectations, governance oversight, accessible reporting mechanisms and continued engagement with suppliers and stakeholders.

We thank our employees, suppliers and partners for supporting ethical business practices and respect for human rights.

Luke Buckley
Chief Executive Officer

28th September 2026

Peter Howell
Chair of the Board

28th September 2026

1. Overview

The Modern Slavery Act 2018 (Cth) requires certain entities carrying on business in Australia to prepare an annual modern slavery statement describing the risks of modern slavery in their operations and supply chains and the actions taken to assess and address those risks.

This Statement has been prepared by New Horizons Enterprises Limited for the Reporting Period from 1 July 2025 to 30 June 2026.

New Horizons recognises that people working within supply chains, particularly through outsourced, subcontracted, offshore, recruitment or labour-supply arrangements, may be vulnerable to exploitation, coercion or abuse. Modern slavery can include forced labour, human trafficking, servitude, debt bondage, deceptive recruitment, child labour and other practices that deprive people of their freedom.

While New Horizons has assessed the risk of modern slavery within its own operations and direct supply chain as low, we recognise that limited visibility beyond first-tier suppliers can create residual risk. Potential areas of exposure include global technology supply chains, cleaning and facilities services, other labour-intensive outsourced services, and recruitment and workforce-placement activities.

This Statement describes:

- the structure, operations and supply chains of New Horizons;
- the modern slavery risks identified across those activities;
- the due diligence, procurement, contractual, governance and reporting controls used to address those risks;
- how New Horizons assesses the effectiveness of its response;
- the priorities identified for the next reporting period.

New Horizons is committed to continuing to strengthen its understanding and management of modern slavery risk through proportionate due diligence, supplier engagement, effective reporting mechanisms and ongoing governance oversight.

2. Structure Operations and Supply Chain

Who are we?
New Horizons Enterprises Limited (ACN 002 066 604) is an Australian public company limited by guarantee and the reporting entity for this Statement.

For more than 55 years, New Horizons has delivered services that support people living with disability, people experiencing mental health challenges, older Australians, young people and individuals experiencing disadvantage.

New Horizons operates throughout New South Wales, with its head office located in North Ryde.

During the Reporting Period, New Horizons employed approximately 1,185 staff across its operations. Our workforce is located entirely within Australia and is supported by robust governance, risk management and workplace compliance frameworks.

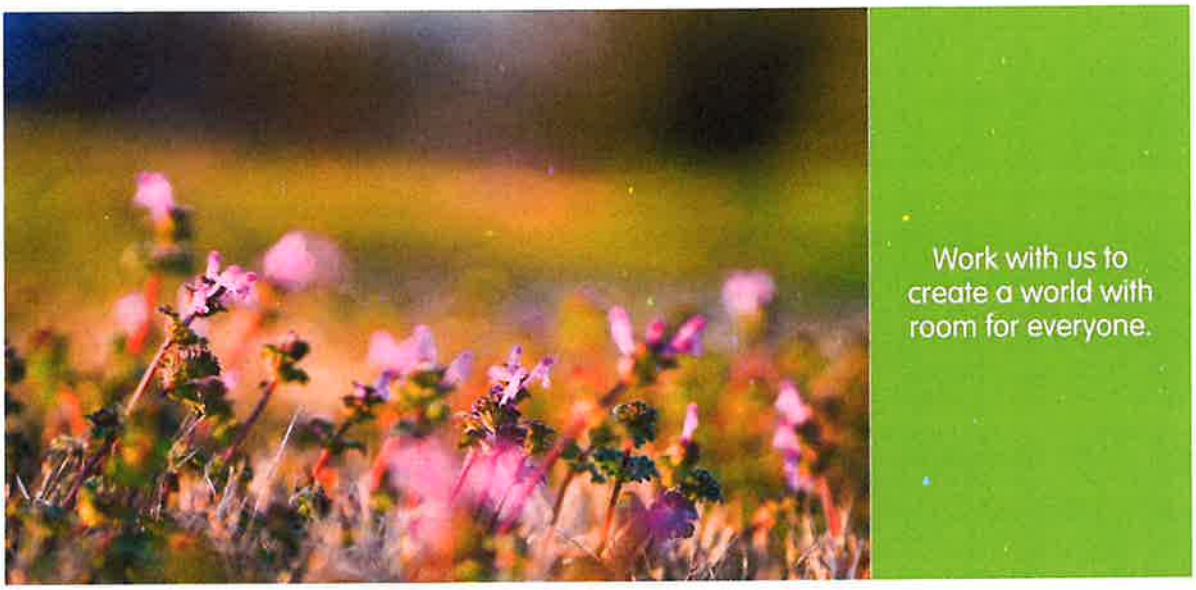
Services delivered by New Horizons include:

- Disability support services
- Mental health services
- Aged care home services
- Housing and homelessness support
- Youth and family support

In addition to our core services, New Horizons operates a number of social enterprises and community initiatives that support our charitable purpose:

- Wellbees - a sustainable bee frame enterprise

- Packable - a social enterprise offering packing solutions
- Barista Brunch Bar (BBB) – a food truck based at New Horizons' head office providing drinks, snacks and meals to the local community



Supply Chain

During the Reporting Period, New Horizons engaged more than 563 suppliers providing goods and services across operational and corporate functions. Approximately 96.5% of suppliers were based in Australia, with a small number of suppliers operating in overseas jurisdictions including the United States, Germany, Italy, New Zealand and Sweden.

The majority of procurement expenditure relates to:

- Information technology and telecommunications
- Professional and advisory services
- Property and facilities management
- Human resources and workforce services
- Health and wellbeing services
- Office and operational supplies

The supply chain includes both trade and non-trade suppliers. Trade suppliers directly support the delivery of services and workforce capability and include labour hire, recruitment and specialist service providers.

Non-trade suppliers support the organisation's operational, property, technology and governance functions. These suppliers provide services such as insurance, fleet management, facilities maintenance, information technology, telecommunications, utilities and professional services.

While the majority of suppliers operate within Australia, New Horizons also engages a small number of overseas suppliers. These suppliers are concentrated in the technology sector

and primarily provide cloud hosting, software platforms, workforce scheduling systems, HR and learning management systems, procurement solutions and customer relationship management platforms. Overseas suppliers are primarily located in the United States, Germany, New Zealand, Italy and Sweden.

Supplier relationships are generally long-term and service-based, with many strategic suppliers engaged under ongoing contractual arrangements covering workforce services, technology platforms, insurance, property maintenance and professional services.

Although the overall risk profile is assessed as low, New Horizons acknowledges that modern slavery risks may exist within broader supply chains where there is reduced visibility of lower-tier suppliers and workforce practices.

3. Our Modern Slavery Risks

During the Reporting Period, New Horizons assessed modern slavery risks across its operations and supply chains

Based on that assessment, the overall risk of modern slavery within New Horizons' operations and direct supply chain remains low. This assessment reflects:

- Approximately 96.5% of suppliers are based in Australia and are subject to robust labour laws, industrial relations frameworks and modern slavery legislation.
- The small number of overseas suppliers are located in developed countries with established legal protections relating to labour rights and modern slavery.
- The majority of goods and services procured by New Horizons are professional, corporate and operational support services that are generally considered lower risk for modern slavery exposure.
- Existing procurement, contract management, supplier assurance and governance controls support the identification and management of modern slavery risks.

Geographic risk level: Low

Geographic risk remains low. Approximately 96.5% of New Horizons' suppliers are based in Australia and operate within a jurisdiction with strong workplace protections, industrial relations frameworks and modern slavery legislation.

New Horizons' overseas suppliers are located in developed countries, including the United States, Germany, Italy, New Zealand and Sweden. These jurisdictions have established legal protections relating to labour rights and human rights, and several maintain legislative or regulatory frameworks relating to modern slavery and labour exploitation.

New Horizons does not directly procure goods or services from suppliers located in countries generally regarded as having a high prevalence of modern slavery. In assessing geographic risk, New Horizons considered the location of overseas suppliers against recognised external risk indicators, including the Global Slavery Index. Based on this assessment, geographic risk remains low.

Sector and industry risk level: Low

New Horizons operates within the not-for-profit, disability, mental health, aged care, housing and community services sectors. These sectors are subject to significant regulatory oversight and governance requirements, which contributes to a lower overall sector risk profile.

However, New Horizons recognises that modern slavery risks may arise beyond its immediate operations and within broader supply chains supporting service delivery. Potential areas of exposure include technology supply chains, facilities management, cleaning services and other labour-intensive services where subcontracting arrangements may reduce visibility over workforce practices.

While the overall sector and industry risk is assessed as low, New Horizons continues to monitor these areas through procurement, contract management, supplier assurance and

governance processes.

Product and services risk: Low

Most products and services procured by New Horizons are professional, corporate and operational support services, including information technology, telecommunications, professional advisory services, workforce management systems, facilities management and office supplies. These categories are generally considered lower risk for direct modern slavery exposure.

However, New Horizons recognises that modern slavery risks may exist within the supply chains supporting certain products and services, particularly where subcontracted labour, outsourced service delivery or complex global supply chains are involved. This is most relevant in areas such as technology supply chains, cleaning and facilities services, and other labour-intensive services where visibility over workforce practices may be reduced.

Workforce and Recruitment and Labour Supply Risk

New Horizons directly employs its workforce in Australia and operates within a regulatory environment that includes workplace relations, employment, work health and safety and anti-discrimination legislation. As a result, workforce-related modern slavery risk within New Horizons' direct operations is assessed as low.

While no instances of modern slavery were identified during the Reporting Period, workforce and labour supply activities remain subject to ongoing due diligence, contractual controls and governance oversight

4. Due Diligence

New Horizons remains committed to preventing and addressing modern slavery risks within our operations and supply chains. We recognise that due diligence is an ongoing process requiring vigilance, collaboration and continuous improvement.

Given the complexity of supply chains, visibility beyond first-tier suppliers remains challenging. To mitigate this risk, New Horizons continues to undertake due diligence activities as part of procurement, supplier onboarding, workforce engagement and contract management processes.

Key Due Diligence Measures

Throughout the Reporting Period, New Horizons maintained and enhanced its established due diligence procedures.

Modern Slavery Statement Disclosure

Where applicable, New Horizons considers supplier modern slavery disclosures as part of its due diligence activities. These disclosures assist in assessing supplier awareness, risk profiles and the controls implemented to identify and address modern slavery risks.

Standard Terms and Conditions

New Horizons incorporates modern slavery obligations into its standard procurement documentation and supplier terms. Suppliers are expected to comply with all applicable laws, maintain ethical employment practices and notify New Horizons of any actual or suspected modern slavery concerns within their operations or supply chains.

Ethical Tendering Practices

New Horizons seeks to promote ethical and transparent procurement practices. Supplier assessments consider a range of factors beyond price alone, including risk, compliance and alignment with organisational values. Modern slavery risks form part of procurement decision-making and supplier selection processes.

As part of its supplier assurance activities, New Horizons engages a cleaning contractor that is a member of the Cleaning Accountability Framework (CAF), an independent certification and assurance scheme designed to improve labour standards and reduce modern slavery risks within the cleaning industry.

Supplier Agreements

Supplier agreements incorporate obligations relating to ethical business practices and modern slavery. Suppliers are expected to take reasonable steps to prevent modern slavery within their operations and supply chains and to notify New Horizons of any actual or suspected concerns.

Combatting Modern Slavery Policy

The Combatting Modern Slavery Policy continues to provide the framework through which modern slavery risks are identified, monitored and managed. The policy remains a key component of New Horizons' governance and risk management framework.

Supplier Code of Conduct

The Supplier Code of Conduct establishes clear expectations that suppliers:

- Comply with applicable laws and industry standards;
- Conduct business ethically and responsibly;
- Respect and uphold human rights;
- Provide transparency regarding their operations and supply chains; and
- Report actual or suspected modern slavery concerns.

The Code supports New Horizons' commitment to responsible procurement and supplier accountability.

Grievance and Remediation

New Horizons maintains mechanisms that enable employees, contractors, suppliers and other stakeholders to raise concerns regarding unethical conduct, human rights issues or potential modern slavery risks.

The Whistleblower Hotline remained available throughout the Reporting Period and allows concerns to be raised confidentially and anonymously.

No reports or allegations relating to modern slavery were received through the Whistleblower Hotline or other reporting channels during the Reporting Period.

Should any concerns be identified, New Horizons is committed to investigating matters appropriately, working with relevant stakeholders to address adverse impacts and implementing measures to prevent recurrence.

5. Assessing the effectiveness of our action

New Horizons continued to assess the effectiveness of its modern slavery response through governance oversight, supplier engagement, procurement controls, due diligence activities and the operation of reporting mechanisms.

During the Reporting Period:

- No instances of modern slavery were identified within New Horizons.
- No reports relating to modern slavery were received through the Whistleblower Hotline or other reporting channels.
- Existing procurement, supplier due diligence and contract management processes remained in operation.
- Governance arrangements continued to support oversight of modern slavery risks across New Horizons.
- No allegations or reports relating to labour exploitation, unethical employment practices or modern slavery were identified in connection with New Horizons activities.

Based on these activities, New Horizons considers its existing controls appropriate to its assessed modern slavery risk profile. However, New Horizons recognises that assessing effectiveness remains an evolving area and that continual improvement is necessary to strengthen visibility across operations and supply chains.

New Horizons will continue to mature its approach through enhanced supplier engagement, improved data collection, ongoing monitoring activities and strengthened risk reporting processes.

6. Process of consultation

The development of this statement involved consultation with relevant internal stakeholders across the organisation to inform the assessment of modern slavery risks and the effectiveness of actions undertaken during the reporting period.

7. Key Priorities for FY2027

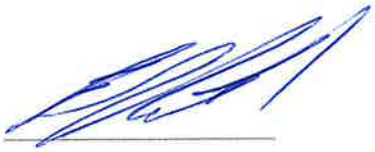
During the next reporting period, New Horizons will focus on:

- Enhancing supplier due diligence processes by ensuring via contract reviews that modern slavery clauses are included in all third-party supplier agreements.
- Increasing organisational awareness of modern slavery risks.
- Enhancing oversight of visa-sponsored workers to ensure their rights are understood and protected.
- Continuing engagement with suppliers regarding ethical sourcing and human rights expectations.

These activities will support the ongoing maturity of New Horizons' modern slavery framework and strengthen our ability to identify and respond to emerging risks.

Statement from New Horizons' Board Chair

This Modern Slavery Statement was approved by the Board of New Horizons Enterprises Limited (ACN 002 066 604) on 28 September 2026.

Signed: 

Peter Howell
Chair of the Board

Date: 28 September 2026

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

For queries relating to this statement:

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

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