

Modern Slavery Statement 2020-2021

Head Office – 1 Fennell Street, North Parramatta NSW 2151

This statement covers the activities of The Northcott Society (Northcott)

ABN: 87 302 064 152 and its owned entities, in line with the Modern Slavery Act 2018 (Cth)

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About us

Our Values and Mission

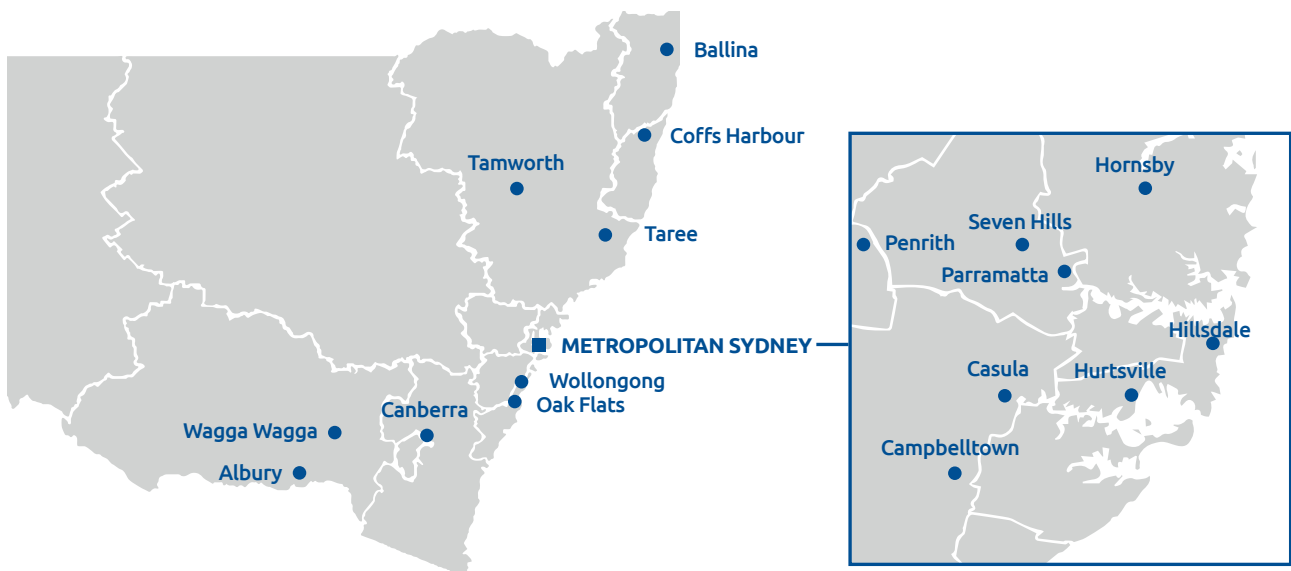
Our purpose is to build an inclusive society where people can live the life they choose. We support people with disability to reach their full potential by providing services and support to promote a genuinely inclusive society.

Our vision is to grow our services because customers choose us as their provider of choice. We are a values-based organisation that strives to foster a workplace culture based on our core values. We are:

- **Innovative** because we develop new ideas and solutions with creativity in anticipation of changing needs
- **Respectful** because we believe that everyone's voice is unique and that they have the right to be heard
- **Brave** because we have the courage to stand up for people with all abilities even in the face of adversity



Northcott has offices throughout NSW and the ACT, including Metropolitan Sydney, south to the Victorian border and north to the Queensland border. Additionally (and not indicated here), we have over 100 group homes, respite and specialist supported living services based throughout NSW.



What is Modern Slavery?

Modern slavery is the term used to describe situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Under Australian and international law, modern slavery includes offences such as human trafficking, forced labour, servitude, child labour, deceptive recruiting and debt bondage. It is estimated that there are approximately 40 million victims of modern slavery around the world today.

Sadly, modern slavery is not just an international issue. The evidence is clear that there are people in Australia who are also affected. In addition, Australia imports millions of dollars' worth of products which may have been produced by victims of modern slavery.

In our previous statement, we began reviewing our processes and communicating with our suppliers to understand the potential risks linked to our organisation. We established the Modern Slavery Working Group, developed a training module for staff who are involved in purchasing goods and services, and increased our communication of modern slavery throughout the organisation. In this statement we discuss what has been achieved over the financial year 2020-2021 including increased communication with our staff and suppliers, and training.

Our Modern Slavery Statement has been prepared in accordance with the Australian Modern Slavery Act 2018. This statement outlines the risks of modern slavery in our operations and supply chain, and the actions we are taking to address these risks and assess their effectiveness.

Message from our CEO



I am pleased to present Northcott's second Modern Slavery Statement, made in accordance with the Modern Slavery Act 2018 (Cth), for the financial year ending 30 June 2021.

We believe that everyone, everywhere has the right to a life free from any form of modern slavery and we strongly support efforts to help eliminate modern slavery in all areas of business. At Northcott, we seek to identify and take actions where a risk of modern slavery is identified in our operations or supply chains.

To help achieve this, we have established a Modern Slavery Working Group, made up of representatives from all areas and subsidiaries of our organisation, which allows for continued collaboration across business areas, levels of authority and entities.

We recognise that modern slavery cannot be eradicated overnight and there is always more work to do. We will continue to work with all areas of the organisation to improve our approach and response to modern slavery.

A handwritten signature in black ink, which appears to read "Liz Forsyth". The signature is written in a cursive, flowing style.

Liz Forsyth
CEO, Northcott

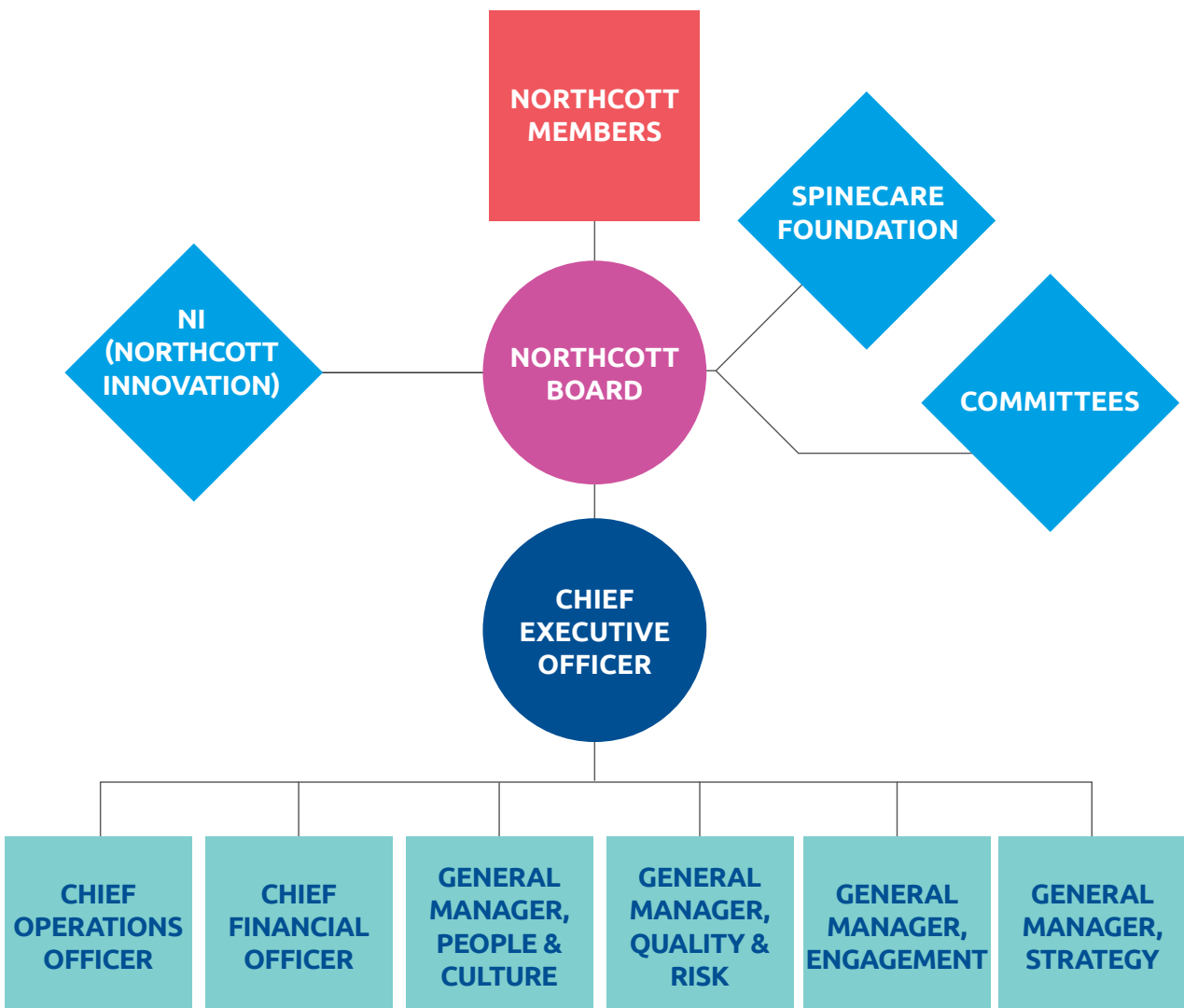
Criteria 1 & 2: Our organisation

Northcott is a not-for-profit disability service provider that works with customers to realise their potential. As one of Australia’s largest and oldest not-for-profit disability service organisation, with over 90 years of experience and expertise in the field, we provide services from metropolitan and regional locations throughout NSW and the ACT.

As a registered NDIS provider, we employ over 2,600 staff and provide empowering, personalised services to over 14,000 people with disability, their families and carers each year.

Organisational Structure

During the financial year of 2020-2021, Northcott reviewed its organisational structure to align operational service delivery, simplify operational support and corporate functions, and ensure the right resourcing is available to support our strategic vision and business plan. The below organisational structure came into effect from July 2021.



Operations and Structure

Northcott provides support and services to people with disability, their families and carers from over 150 locations across NSW and the ACT, with all divisions and subsidiary businesses working together to provide our full service offering. Northcott comprises of the following entities:



Northcott Innovation Ltd (NI)
ABN 45 601 575 633



SpineCare Foundation
ABN 98 003 427 272



Northcott Supported Living Ltd
(a fully integrated division of Northcott)



Northcott Therapy trading as asOne
(a fully integrated division of Northcott)

The services that Northcott provides are:

- Centre Based Respite
- Coordination of Supports
- Early Childhood Early Intervention (ECEI)
- Everyday Life Skills
- Housing and Supported Independent Living
- In-home and Community Supports
- Sexuality and Relationships Education, in conjunction with NI
- Short Breaks and Outings
- Skills 4 life
- Therapy
- Vocational Skills
- Aboriginal and Torres Strait Islander programs
- Orthotics and Custom Footwear
- Nursing
- Person Centered Behavior Support
- Outside School Hours Care

The Northcott Society



All entities are wholly owned subsidiaries of The Northcott Society and share main business functions such as Human Resources, Learning and Development, Finance, Payroll, Contracts and Procurement, Fleet, Facilities, IT and Communications.

The services that Northcott's subsidiaries provide are:

NI (Northcott Innovation)



- Accessible and inclusive co-design services
- Incubator and Accelerator supports for solutions benefiting the disability community
- Consultative supports to organisations seeking to work alongside people with disability



SpineCare
Foundation

- Community and Professional Education
- Provision of Tertiary scholarships
- Research

Supply chains

Northcott is a service-based organisation, providing person-to-person support for people with disability. As discussed in our previous statement, our supply chain is quite limited as Northcott does not manufacture goods, outside of our orthotics and custom footwear service. However, we procure products and services to support our teams, and our suppliers may have supply chains which are quite layered. The products and services we procure include:

- Vehicles (cars and vans, some with modifications which are completed here in Australia) and related services (vehicle servicing and repairs and petrol)
- Labour services such as nursing and support worker staff
- Construction and property facility services (builders, plumbers, hygiene and pest control services, cleaning services, painters, etc.)
- IT and phone related equipment and software
- Business related stationery and merchandise, craft supplies and education material
- PPE, sanitary and cleaning products
- Utilities, gas, water and electricity
- Professional services such as consultants in various areas of the organisation.
- Leather, rubber, plastics, metal, glues and other shoe related products for our custom footwear and orthotics
- Grocery and food products
- Whitegoods and furniture

Criteria 3: Potential risks in our operations and supply chains

This year we identified new suppliers who Northcott had engaged, and any suppliers who were missed in the previous year. These results were broken down and provided to each member of the Modern Slavery Working Group, to discuss with their wider teams and advise of any other suppliers they have recently begun working with. This was also an opportunity to discuss any risks they may have found within their area or the suppliers they have been working with. These suppliers were all sent questionnaires to better understand their supply chains and risks that may be present within their organisations, which may affect Northcott.

The process revealed that the risks identified last year are much the same. The products we procure in the IT, Facilities and Fleet areas, that are manufactured overseas and have many levels in their supply chain, show that we have a link to Modern Slavery. Some of the people who work in the supply chains of these areas, may perform work with low visibility or legal protections and is important that these issues are raised with suppliers during regular review meetings so they can be addressed appropriately.

PPE was still in high demand as we continued to work through the COVID-19 pandemic, however we have seen more stock available in Australia particularly over the warmer months and when requirements to wear masks in certain circumstances, have eased. We now have in place preferred supplier arrangements with suppliers to ensure our risks are minimised and our engagement and management with preferred suppliers has increased. We still believe there are potential risks due to the mass production of masks made in China, despite no major risk being reported from our suppliers.

The COVID-19 pandemic has additionally unearthed many examples of Modern Slavery within Australia's agricultural sector due to farms claiming they are not being able to find workers. This has been caused by the reduction of people migrating to Australia, particularly from South East Asia and the Pacific on working visas. There has been a great deal of media coverage on the exploitative practices on farms with firsthand accounts of what people experienced. Northcott purchases the majority of its fresh produce from Coles and Woolworths supermarkets and sometimes from ALDI, IGA and small local grocers and the risk has been highlighted as a direct link to Modern Slavery. Further discussions are required with Coles and Woolworths to understand how they are addressing these risks and how these are reported in their Modern Slavery Statements.

This year's scoping process also revealed that there was higher awareness of Modern Slavery amongst suppliers, as we experienced less uncertainty regarding the questionnaire. This is reflected in the overall responses received, compared to last year. This can be attributed to larger organisations increasing their engagement with their suppliers, due to the Modern Slavery legislation and reporting requirements and more media coverage of the subject, particularly as the COVID-19 pandemic has disrupted supply chains and movement of people across the globe.

Criteria 4: Assessing and addressing the risk

As mentioned in Criteria 3, we completed our scoping process and sent out our Modern Slavery Supplier questionnaire, to assess the risks that may be present in our supply chain. Based on the findings, we reviewed our actions from our previous statement and set a goal to see where we could improve on what we had achieved.

Last year, we said that we prided ourselves in promoting and advocating for the rights of all human beings and to create a safe, supportive and inclusive environment for everyone who works with Northcott. To strengthen this statement and our commitment, we created and implemented our Modern Slavery Policy and Procedure, and shared this with the organisation. The policy and procedure outlines our approach to reducing the risk of Modern Slavery practices within our operations and supply chains, across all areas of our organisation and how to report concerns of Modern Slavery.

With a continuous improvement approach, we continued our engagement with our internal and external stakeholders to ensure the measures we had implemented were current and effective, or needed review. The following table shows what measures were implemented in the last period and the progress and changes we made during this period.

| Action taken 19-20 period | How it assesses and/or addresses - Modern Slavery risks | Progress over the 20-21 period |
|---|---|---|
| Establishment of the Modern Slavery Working Group | The Working Group will meet quarterly and includes representatives from every department/area of Northcott. This group allows business units to collaborate, share ideas and help raise awareness within the business and within teams. | The Working Group has met continually on a quarterly basis and the group was expanded to include additional areas of the business. All new members of the Working Group are inducted to ensure they are able to support their area and identify risks that may appear. |
| Creation of the scoping process | The scoping process will be completed annually to ensure that we are capturing and targeting any new suppliers, where risk of Modern Slavery may be present within their business or supply chain. | The scoping process was completed again in this period which assisted in capturing any new suppliers and suppliers who may not have completed a questionnaire previously. |

| Action taken 19-20 period | How it assesses and/or addresses - Modern Slavery risks | Progress over the 20-21 period |
|--|---|---|
| <p>Implementation of due diligence processes</p> | <p>Northcott has created a Modern Slavery Supplier Questionnaire which has been sent to our top tier suppliers (high spend in each of our categories).</p> <p>It is hoped that the questionnaire will be sent to all current suppliers annually to ensure consistency, highlight risks which may need to be addressed and act as a way of communicating to suppliers on the subject of Modern Slavery. This process will continue to be improved and streamlined.</p> <p>Northcott has added questions regarding Modern Slavery in all tenders and request for quotes, to understand what suppliers already have in place in regards to Modern Slavery. This allows us to align and work with suppliers who share our values.</p> | <p>Our Modern Slavery Supplier Questionnaire was adjusted this period to ensure we are keeping up to date with changes and communicating with our suppliers.</p> <p>The questions added to tenders and requests for quote, have allowed us to choose suppliers who more closely align with our values, prior to engaging with them. This has proved effective as suppliers also gain an understanding of our organisation and our expectations of them upfront.</p> |
| <p>Benchmarking of our results</p> | <p>The results of this year's Modern Slavery Supplier Questionnaire will form the benchmark for Northcott and our suppliers, to continually improve upon.</p> <p>We will also keep track of the percentage of our staff who have completed the Modern Slavery training module.</p> | <p>The results of this year's Modern Slavery Supplier Questionnaires were analysed and compared to last year's. We shared this with the working group, so they also gain an understanding of how our suppliers are engaging with us.</p> <p>The percentage of employee training is also being tracked to ensure compliance.</p> |

| Action taken 19-20 period | How it assesses and/or addresses - Modern Slavery risks | Progress over the 20-21 period |
|--|--|---|
| Creation of a Northcott branded Modern Slavery Training Module | <p>The training module will be a way to communicate to staff about Modern Slavery and the risks that may be present, not just from an organisational perspective, but also in our everyday lives. This training has been rolled out before the end of 2020 to staff who may purchase goods and services, and then to all staff by early 2021.</p> <p>Our Modern Slavery Training module will also inform staff on how to report an incident of Modern Slavery, which will be handled by our whistle blower provider.</p> | <p>The Northcott branded training module has been successful and has been completed by all staff who have authority to spend within the business. We wanted to roll out training to all other employees, particularly our frontline workforce, by early 2021 however due to regulatory training required and Covid-19 this has not been achieved. Discussions have continued on the best method of delivery for this group of employees, to ensure we are engaging effectively.</p> |
| Working with children checks* and Police checks | <p>Mandatory for all staff at Northcott.</p> <p>*Mandatory for staff who may have direct or indirect contact with children.</p> | <p>From 1st February 2021 all staff now need to hold an NDIS Worker Check. This replaces the Police Check. Working with children checks are still mandatory for staff who may have direct or indirect contact with children.</p> <p>We also ask our suppliers during tenders, if they are providing a service that is delivered in our offices, if their staff have Working with Children and Police checks.</p> |
| Updating our Enterprise Agreements (EA) | <p>To ensure that all employees receive above the minimum working conditions and wages as our frontline staff provide support services which are key to our organisation.</p> | <p>We recently updated our EA to ensure our staff receive conditions and wages that are flexible, competitive and meet our operational requirements. Our policies and procedures have been updated to reflect this update.</p> |

| Action taken 19-20 period | How it assesses and/or addresses - Modern Slavery risks | Progress over the 20-21 period |
|--|---|---|
| Publicly communicating this to our wider community | Submitting our Modern Slavery Statement and posting it on our website will help to raise awareness amongst the wider community. | We have ensured that our Modern Slavery Statement is publicly available to all internal and external stakeholders by posting to our website and intranet, communicating this via our newsletter, submitting to the Modern Slavery Register online and freely providing copies of it when requested. |

| New Actions for 20-21 | How it assesses and/or addresses Modern Slavery risks |
|---|---|
| Increase engagement with suppliers in more effective ways | Increasing our engagement with our suppliers supports open communication between both parties and encourages sharing and collaboration. We have done this by including an agenda item on Modern Slavery with suppliers who we conduct regular reviews with. Employees who are involved gain insight on how their supplier is reducing the risk of Modern Slavery in their business. |
| Increase engagement with internal stakeholders in more effective ways | Increasing our engagement with internal stakeholders ensures that they are aware of Modern Slavery and the potential risks. We have done this by posting more frequent communication through our fortnightly newsletter. The creation of our Modern Slavery page on our intranet allows employees to access information at any time including related policies, know who the members of the working group in their area are, and act as a central source of information and resources. |
| Creation of our Modern Slavery Policy and Procedure | Our Modern Slavery Policy and Procedure shows our commitment to the elimination of Modern Slavery, brings together related policies that we have across the organisation and gives our stakeholders clear understanding on how to report a grievance. |

Criteria 5: Assessing our effectiveness

Now in our second year of reporting, we are starting to see how our actions are making an impact. With the metrics we began tracking from our original statement being used as the benchmark, we are now able to identify the areas where improvements are required. The metrics or KPIs that we are tracking to assess our effectiveness include:

- Number of suppliers who complete Modern Slavery Statements
- Number of suppliers who have policies and procedures around Human Rights and Modern Slavery
- Number of suppliers who provide Modern Slavery Training to their staff
- Countries that suppliers source products and services from
- Tracking the number of suppliers who use recruitment agencies that source labour from outside of Australia
- Percentage of employees who have completed our Modern Slavery Training module
- Understanding what remediation processes our suppliers have in place.

For the 2020-2021 reporting period we set out to improve on what we had achieved on the previous year. We determined that we needed to increase our engagement across the organisation and with external stakeholders and create our Modern Slavery Policy and Procedure. We have looked at innovative ways we can capture and analyse the data from our Modern Slavery Supplier Questionnaires, through the use of technology and we hope we can implement in the near future.

As part of our continual improvement, we have been reviewing other organisations' Modern Slavery Statements, received from our suppliers and via the Modern Slavery register. This is a useful way to understand how we are tracking against other organisations, across the key criteria and consider how we can do more in this space.

In addition to the above and over subsequent reporting periods, we will continue to review and enhance the KPIs used to assess our effectiveness. The results of these will then be used to determine where improvements need to be made, so that we can continue to build on our response to Modern Slavery.

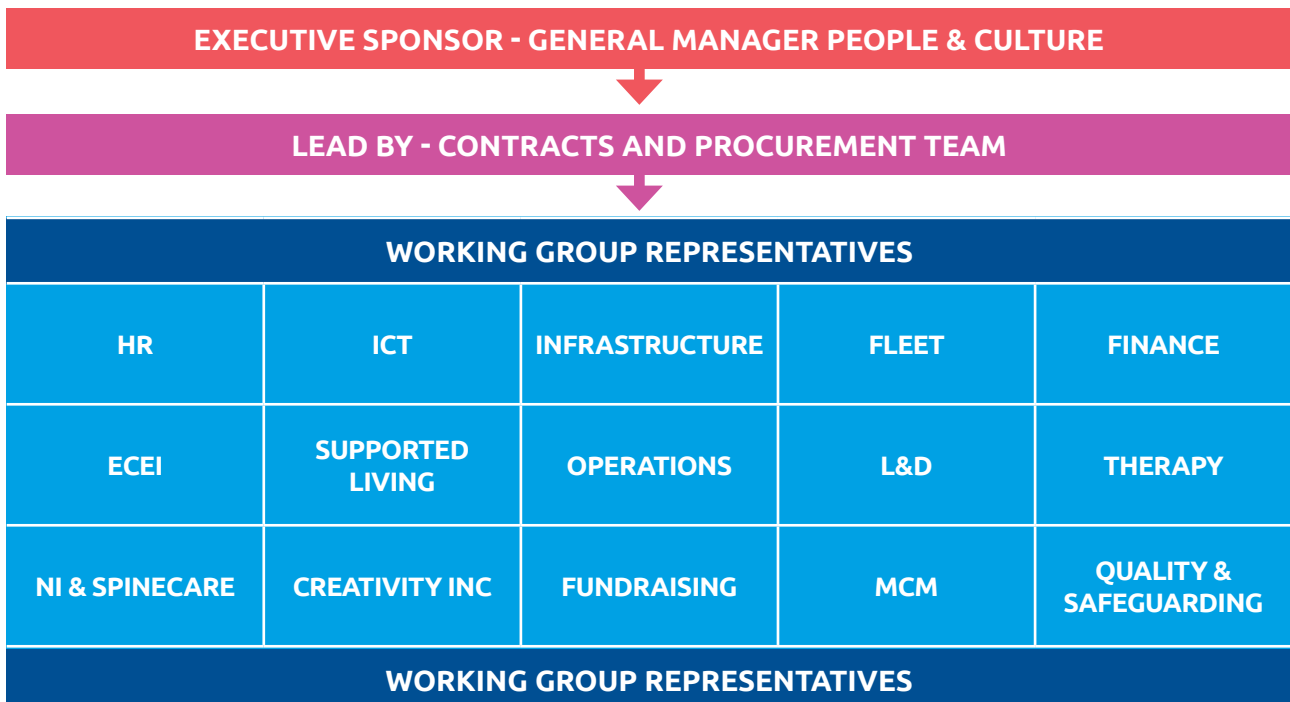
Criteria 6: Working with all our entities

As mentioned in our previous statement and in criteria one and two, Northcott owns several entities and due to our structure it was logical to submit a joint statement and ensure the Modern Slavery Working Group had a representative from each business area and entity, to ensure consistency across the entire organisation. The Modern Slavery Working Group has been a great success as employees involved have higher engagement levels and understanding of Modern Slavery and allows cross collaboration with our entities. The group have continued to meet on a quarterly basis despite COVID-19, collaborated to develop this year's statement and is supported by the Executive Team and the Board of Directors.

Additional representatives have been invited to the working group during this period to ensure we are capturing all areas of the business. The below structure shows the additional representatives. We also ensure that as we have new representatives join the group or when there are changes with employees, they receive a targeted induction with the area they represent in mind. Our representatives are then equipped to see risks as they arise.

In regards to the changes made to our organisational structure in June 2021, we will ensure that the Modern Slavery Working Group reflects those changes to maintain our collaboration across all business areas, levels of authority and our entities and update our next statement accordingly.

Modern Slavery Working Group



Criteria 7: Looking forward

Over the next reporting period we aim to;

- Continue to drive compliance of due diligence processes across our organisation
- Continue our engagement with suppliers
- Continue to deliver training to our staff and update our Modern Slavery training module to ensure information delivered is up to date
- Continue to keep customers, staff, suppliers, volunteers and our wider networks aware of what we are achieving in the Modern Slavery space through our intranet, website and newsletters
- Continue to ensure our broader goals as an organisation align with the metrics we are tracking to ensure we are not inadvertently contributing to Modern Slavery risks
- Strengthen relationships and partnerships that we have made with civil society organisations such as Anti-Slavery Australia and the National Partnership against Modern Slavery
- Continue to improve on what we have implemented so far.



Disclosure note

This statement has been made on behalf of The Northcott Society (Northcott). This Statement covers all entities owned or controlled by Northcott.

This Statement is approved by Northcott's Board of Directors on 25 November 2021 and signed by Michael Briggs, Chair of Northcott's Board of Directors.

A handwritten signature in black ink, appearing to be 'M Briggs'.

Michael Briggs
Northcott