

Modern Slavery Statement – December 2021

Introduction

The Yooralla (ACN 005 304 432) has developed this Modern Slavery Statement ('the Statement') in line with the Modern Slavery Act (2018) ('the Act') requirements.

The Statement outlines the actions undertaken to identify and address any modern slavery risks taking place in Yooralla's operations and supply chains during the reporting period (1 July 2020 to 30 June 2021).

Yooralla was established in 1918 to support people with disability and has become one of Victoria's largest and oldest disability service providers. This is the first Statement prepared by Yooralla and reflects our initial steps and commitment to comply with the Act.

Our reporting entity

This Modern Slavery Statement covers Yooralla, a registered charity with the Australian Charities and Not-for-profits Commission located in Victoria, Australia. Yooralla is a company limited by Guarantee (ACN 005 304 432 and ABN 14 005 304 432).

This Statement has been prepared in accordance with the requirements of the Australian Modern Slavery Act. As part of this Statement, Yooralla reports on its actions to assess and address modern slavery risks associated with its operations, supply chains and investment portfolio.

Our Corporate Structure

Yooralla is a public company limited by guarantee. There are no subsidiaries nor joint ventures. In the reporting period, Yooralla had 1,731 employees. An estimated 171 volunteers were engaged.

Our Operations

Yooralla provides a wide range of tailored, flexible and quality services for people with disability of all ages and needs, as well as carers. Examples include:

- **Accommodation** - Yooralla provides many supported independent living options for people with disability across Victoria (metro and regional).
- **Assistance with daily living** - Providing high-quality, individualised supports in your home and community.
- **Communication and assistive technology** - Yooralla's Assistive Technology services support children and adults with disability, their families and carers to access a range of assistive technology services.

- **Community hubs and support** - Yooralla provides community-based supports for people with disability, where every individual is encouraged to pursue their goals by accessing skills-based learning, recreation and social activities.
- **Job skills and employment pathways** - Yooralla supports people with disability to pursue their employment goals by providing job skills training and building pathways into employment.
- **Specialist children's support** - Yooralla provides specialised early intervention programs and children's therapy, to support children and families.
- **Therapy** - Yooralla's Therapy services support adults and children with disability at all ages and life stages.
- **Support coordination** - Yooralla provides Support Coordination to help people with disability and their family or support network to navigate through the different stages of their National Disability Insurance Scheme (NDIS) journey and achieve their NDIS goals.
- **Support for children with autism** - Yooralla provides tailored services for children with autism, recognising the importance of early intervention in building a child's capacity through their early years.
- **Investment Portfolio** - Yooralla has established an Investment Portfolio to generate income and growth to support activities in the future. This includes both short-term and long-term investments.

Supply Chain

Our supply chain consists of services and goods that support our main activities, provided by approximately 465 suppliers with whom Yooralla currently has formal agreements. Examples of key suppliers include:

- Professional services
- Building maintenance
- Materials manufacturing
- Attendant care agencies
- IT Consultancy services
- Utilities
- Healthcare products
- Rental properties

These key supplier agreements for the provision of goods and services are with organisations with operations across Australia, Germany and Malaysia.

Our broader supply chain is both large and complex, likely spanning a wide range of industries and geographies. To date, we have not conducted any risk assessments beyond our Tier 1 suppliers. Supply chains are divided into different 'tiers'. 'Tier 1' suppliers are contracted directly to provide goods and services, who in turn may subcontract to 'Tier 2' suppliers.

Yooralla recognises that over time we will need to better understand the Tier 2 suppliers and beyond in order to effectively manage our modern slavery risk. We understand that the Act requires Yooralla to assess the effectiveness of our actions.

Yooralla recognises and intends to classify our supply chain in terms of risk of modern slavery for future reporting periods.

Identification of risks of modern slavery in our operations and supply chain

a) *Risks within our operations:*

- Services provided by Yooralla are delivered by a team of skilled, professional staff
- Within our operations, Yooralla acknowledges that our workforce includes employees and external contractors with temporary or voluntary work settings, immigration visas and who have English as a second language, which increases risk.
- As part of its long-term organisational stability and growth, Yooralla has established an Investment Portfolio to generate income and growth to support activities into the future. We

recognise the potential risks associated with the investment in companies that do not engage in ethical practices or have exploitative practices within their supply/value chain.

b) Risks within our supply chain:

- In this reporting period, almost all our direct suppliers were organisations based in Australia, which is considered to be a region at lower risk of modern slavery. We do, however, recognise that modern slavery is still present in Australia and as such, should be a consideration when engaging with our suppliers.
- The small proportion of Yooralla's suppliers not based in Australia were based in countries such as Germany and Malaysia. Yooralla's acknowledges that some of our suppliers are operating in countries where modern slavery risks may be more prevalent, such as Malaysia. We recognise the potential risks associated with the use of external suppliers.

Yooralla has carried out a high-level supplier risk assessment for our direct (tier 1) suppliers as a first step to better understanding the level of risk in our supply chain. This will help guide our approach to manage modern slavery risk with our suppliers moving forward.

For the reporting period, the majority of Yooralla's direct suppliers have been identified as belonging to industries that are classified as high or medium risk. These include:

- Industrials (e.g. cleaners, security services, food and catering, equipment repair services)
- Health Care (e.g. manufacturers of health care equipment and devices, technology services to healthcare providers)
- Information technology
- Consumer discretionary

Yooralla is committed to responsibly assessing and addressing modern slavery risks within our operations and throughout our supply chain. It is our aim to take steps to prevent and, if required, address any modern slavery in connection with our own operations, as well as the suppliers who work with us or act on our behalf.

Examples include:

- enhancement of existing policies (e.g. Modern Slavery, Purchasing, Investment and Whistleblower policies);
- existing face-to-face and online platforms to deliver training to relevant employees on policies and tools (e.g. Induction program provided to relevant employees);
- investment policy incorporating ethical requirements for new investments;
- Whistleblower policy available to employees, customers, carers, family, visitors, volunteers, agency workers and members of the public.

Although we are in the early stages of our modern slavery approach, there are a number of existing governance processes which we have begun to leverage as we further develop. These include:

- Yooralla has an implemented approach to manage a wide range of existing business risks. A key aspect of this approach is the quarterly Audit and Risk Committee (ARC) meetings where risks are reported. The Risk Reporting is also reviewed by the CEO prior to the ARC quarterly meetings.
- As per Yooralla's Purchasing policy, the selection of suppliers is based on the assessment of both quantitative and qualitative factors. Once the supplier is at contract stage, it is then subjected to Senior Management endorsement, prior to the commencement of an agreement. While there have been no significant changes in Yooralla's procurement approach during the reporting period, we now have modern slavery requirements incorporated into our purchasing policy.
- Yooralla has not received any reports of incidents of modern slavery in our operations or supply chain during the reporting period of this statement.

- Yooralla supports the development and implementation of the Modern Slavery Act and this is the first Modern Slavery Statement developed by our organisation. We acknowledge that Yooralla is in the early stages of developing its approach to manage this important issue within our organisation and supply chain.
- To address this, Yooralla is in the process of developing an internal Roadmap for Modern Slavery Risk Management. The Roadmap will encompass all aspects of good risk management, including a focus on guiding our organisation through the set up and delivery of key actions and milestones.
- The Roadmap will not only contain actions regarding the development of internal processes and controls, but also a process of review, assessment and continual improvement. Yooralla commits to providing an update on the progress of our Roadmap activities in future Statements.

In addition, Yooralla's suppliers may themselves engage with suppliers who operate within geographical regions or industries that have elevated modern slavery risk. Unfortunately, Yooralla does not currently have full visibility over the services and goods sourced by our suppliers. In future periods, we will work to improve our understanding of the modern slavery risk beyond the first tier of our supply chain in order to better understand and manage this in the future.

As part of our efforts to build an understanding and improve management of modern slavery risks, during the reporting period, Yooralla is developing an initial supplier engagement and audit approach.

Evaluation of the effectiveness of our actions:

- Whilst there is nothing in place for assessment of effectiveness, as actions have not been taken yet, as part of the Roadmap, Yooralla is developing an assessment process to assess and address modern slavery risks.
- We acknowledge that Yooralla is in the early stages of developing its approach to manage this important issue within our organisation and supply chain.

Other information

Action plan

As part of Yooralla's commitment to address modern slavery risks in our operations and supply chain, we are currently developing an internal Modern Slavery Roadmap, which will incorporate short, medium and long-term actions aimed at improving our management of potential modern slavery risks.

These actions include:

- Enhancement of our current policies to include modern slavery and human right considerations.
- Assign governance and management responsibility for assessing, addressing and reporting Modern Slavery risks.
- Develop a supplier engagement strategy to identify specific areas of our response to modern slavery risks.
- Develop a risk assessment checklist to identify Modern Slavery risks within Yooralla.
- Develop an engagement plan to collaborate with stakeholders.
- Include amendments on our standard template contracts to take account modern slavery. Develop a protocol based on the level of risk to determine the engagement required with suppliers.
- Develop specific KPIs to measure implementation of modern slavery policies.
- Incorporate modern slavery elements into existing reporting frameworks to review and track the actions we have taken and measure their impact.
- Develop a process to monitor the effectiveness of actions to address modern slavery risks.

These actions will allow Yooralla to ensure continuous progress regarding the effective management of modern slavery risk.

This Statement has been discussed and prepared by our Management team and approved by the Board in accordance with the requirements of the Australian Modern Slavery Act. The Director of Strategy and Risk takes ownership of Modern Slavery risk assessment and compliance.



Jennifer Williams, AM – Chair



Terry Symonds – Chief Executive Officer