

Modern Slavery Act Statement

3 July 2024

— FINANCIAL REVIEW BOSS —

MOST INNOVATIVE
COMPANIES

#1 MOST INNOVATIVE HEALTH COMPANY 2020

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Introduction

As a people-passionate organisation committed to making a difference in our Australian and Global Community, Arriba Group strongly supports the goal of eradicating all forms of modern slavery.

Our Modern Slavery Statement and Commitments for 2024-2025 align with our purpose - Empowering Lives Together. We put people first because people are at the core of our business. Our Modern Slavery Statement and Commitments align with our ethical and moral obligations and the growing importance of human rights to our employees, customers, clients and communities we operate in.

This is our first group-wide Modern Slavery Statement. While we do not have a compliance obligation to report as we do not meet the consolidated revenue threshold under the *Modern Slavery Act 2018*, we are committed to upholding human rights and the prevention and eradication of modern slavery. 'Freedom from slavery' is a fundamental human right and it applies to everyone.

Our approach to modern slavery and human rights is grounded in a variety of codes, regulations and statutes, including:

- *Modern Slavery Act 2018* (Cth)
- *Criminal Code Act 1995* (Cth)
- United Nations Universal Declaration of Human Rights
- Ethical Trading Initiative (ETI) Base Code
- United Nations Global Compact
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights

About us

Our Purpose

Empowering lives together






Our Mission

To be Australia's most progressive people-centric company to achieve the best outcomes for all clients.

Our Group Vision

To be the number one nation-wide market leader in occupational rehabilitation, employment, specialist allied health services and provider of choice to our customers and people.

Our Values

 <p>Customer-focused</p> <p>We deliver exceptional customer service for all those we deal with.</p>	 <p>People-passionate</p> <p>Putting people first. People are the core of everything we do.</p>	 <p>Quality-orientated</p> <p>Our solutions measure and deliver proven outcomes.</p>
 <p>Innovation-driven</p> <p>We challenge and disrupt to drive purpose-driven innovation.</p>	 <p>Dynamic and agile</p> <p>Forward-thinking keeps us ahead of the pack; we build fast, learn fast, adapt fast.</p>	

The Arriba Group has a family of companies that have been created to give people their best opportunity in life. Founded in 1998, the group includes Rehab Management, Aimbig and Livebig.

People are at the heart of everything we do. We believe that every individual deserves a better future. As a human services organisation, our employees are at the core of everything we do, and their welfare is of utmost importance to Arriba Group. Without our people we will be incapable of providing the high-quality services that we do. Because of this, we strive to provide an environment where our people can flourish.

Our work and outcomes are supported by our skilled workforce. We challenge ourselves to ensure our services truly meet and exceed the needs of our clients and the communities in which we work.

We know that businesses play a fundamental role in eradicating modern slavery in our community. We have implemented a range of mechanisms to ensure the identification of risks and continuous improvement across our business.

At Arriba Group, we hold ourselves to the highest standards of personal and corporate integrity.

Our decisions are driven by:

- Our vision, mission and values
- Compliance with legislation and regulations
- Acting ethically and responsibly
- Meeting community standards and maintaining organisational integrity
- The voice of our clients
- A commitment to diversity and inclusion
- Our organisational risk management framework
- Self-reflection and a growth mind-set for continuous improvement.

Our Operations

The work we do goes to supporting people with disability, people with injury or illness and people seeking employment across Australia.

Rehab Management: Our Rehab Management Team delivers a wide range of client-centric, tailored services to people with injury, illness or disability and integrated rehabilitation and workplace health solutions.

Aimbig: Aimbig Employment is a disability employment services provider, supporting both people with a disability to secure maintain and thrive in meaningful work, and businesses of all sizes to recruit a valuable and diverse workforce.

Livebig: Livebig is a specialist allied health and assessment services provider for people with disability, including those on a NDIS plan. Recognising the need for high quality allied health services for people with disability.

Arriba Corporate: Delivers the corporate services functions across the group companies.

Our Supply Chain

Our supply chain involves the purchase of goods and services needed for our day-to-day operations. Most of our goods and services are sourced from Australia while certain information and communications technology (ICT) services are provided by multinational companies. However, we are aware that even the goods and services sourced from Australia are likely to have supply chain touchpoints in overseas markets.

Categories	Goods and Services
<ul style="list-style-type: none"> Property/Facilities management Fleet Services ICT hardware and software Office suppliers and equipment Travel Food & Catering Contract labour Professional services Service delivery equipment / consumables. Marketing & communications Medical and Assisted Living Equipment Client Service Partners 	<ul style="list-style-type: none"> Builders, office fit outs, cleaning, security, maintenance, electricity, gas and water Vehicle lease and hire, and maintenance Laptops, screens, phones, printers, cabling, software, support and network services Stationery, furniture, white and electrical goods Taxis, accommodation and airfares Events and internal catering Labour for hire Lawyers, auditors and specialist consultants (e.g. Rehab Management consultants) PPE (masks, hand sanitisers, gloves etc.) Promotional merchandise products Mobility aids and equipment Partner employers

Our Risks

We acknowledge that fully understanding and considering our relationship with modern slavery is complex and we adopt a continuous learning approach to assessing risk and due diligence.

Service Delivery

Modern slavery can affect anyone from a wide range of backgrounds and socio-economic circumstances. However, some groups are more vulnerable to modern slavery than others including women, children, migrants, people with disabilities, financially disadvantaged and people in occupations with a low level of protections and knowledge of the laws that affect them. We support these people every day in our work, and therefore it is essential that we build internal capability of our people to advocate for individuals and communities vulnerable to human rights abuses and modern slavery.

Supply Chain

Modern slavery affects almost every sector; however, some sectors pose a higher risk for modern slavery. Sub-contracted services relevant to Arriba Group such as cleaning, security services, promotional merchandise and clothing are some of the high exposure sectors. In the so-called informal (black) economy for example, labour may be sourced by migrants, with workers being paid in cash or in kind.

The following categories of higher risk were identified in our supply chain:

Suppliers that source products from overseas such as promotional merchandise, clothing and ICT hardware

Suppliers that employ large cohorts of overseas workers with base-skills including cleaning, security, building, transport and maintenance

Suppliers that source raw materials from conflict zones or high-risk countries; and

Suppliers that have multiple supply chains with the above risks.

Following an initial evaluation of our supply chain, we intend to classify our supply chain in terms of risk of modern slavery for future reporting periods as follows.

Level	Ranking	Category Description and Examples
Level 1	High Risk	Cleaners, builders, promotional merchandise, office furniture suppliers, medical equipment suppliers
Level 2	Moderate Risk	ICT products, vehicle lease, hire and maintenance, office supplies & stationery, furniture, white goods and electrical, bedding and furniture, medical equipment, removalists.
Level 3	Low Risk	Lawyers, auditors and other professional consultants, utilities, domestic air travel

Our Current State

Arriba Group has zero tolerance for any form of slavery-like practices. We have established formal policies that promote ethical and legally compliant business conduct within our corporate governance framework. These policies include our Corporate Social Responsibility Policy, Code of Conduct, Risk Management Governance Policy, Quality Policy, Supplier Code of Conduct, Group Purchasing Policy and Procedure, Supplier Management Policy and Equal Opportunity & Diversity Policy.

ISO Certified (9001:2015)

Arriba Group is ISO certified for our Quality Management System (ISO: 9001:2015), meaning our business meets best practice standards for our services and processes.

ISO 27001 Information Security Management System (ISMS) certification

Arriba Group is ISO certified for our Information Security Management System (ISO 27001). This means our business ensures adequate security controls that maintain confidentiality, integrity and availability (CIA) of information assets.

Legal, Risk and Compliance Function

A Chief Legal and Risk Officer (CLRO) was appointed in November 2022 to oversee legal, risk, compliance, quality, and safety functions across the business. An enterprise-wide risk management strategy and framework has been developed to support good decision-making in line with Arriba Group's values, objectives, and risk appetite. The CLRO is the nominated risk owner for modern slavery across the Arriba Group and has accountability for ensuring risks associated with modern slavery are identified, controlled, treated, and regularly reviewed.

Environment, Social and Governance (ESG) Strategy

Arriba Group's three-year strategic plan includes the development and implementation of a group-wide Environment, Social and Governance (ESG) strategy. Arriba Group has established an ESG Committee that includes representatives from across the organisation. Initiatives to eradicate modern slavery and increase awareness of modern slavery risks and issues are a key focus for the committee.

Recruitment Process

Our robust recruitment process safeguards our business by ensuring all legislative and standard requirements are met. On occasion, we may use an external recruitment agency to source workers. All external agencies are vetted and verified prior to engagement, in accordance with our supplier management process.

Code of Conduct

Our code of conduct describes the standards and behaviours we expect from all our employees.

Complaints Mechanism

Arriba Group has an accessible and publicised reporting mechanism for concerns or disclosures, which allows for confidential reporting and provides protection from reprisal. There is a clear process for investigating and reporting on the issues raised through the reporting mechanism.

Our Commitments for 2024-2025

Arriba Group is committed to take the following steps in 2024 – 2025:

Governance

Preparing, launching and embedding a modern slavery policy that outlines our commitment to eradicating modern slavery and how to respond to suspected cases of modern slavery.

Strengthening our policies and procedures including our Whistleblower Protection Policy and Procedure to incorporate modern slavery considerations.

Operations – Service Delivery

Reviewing current reporting mechanisms to increase data collection and analysis.

Improving awareness of modern slavery risks across the business through a communication and online learning campaign.

Supply Chain

Establish a central repository of product and service suppliers to improve visibility on Arriba Group's Tier 1 Suppliers

Develop a standardised clause to include in Arriba Group contracts/service agreements that requires suppliers to commit to a declaration in writing confirming that in the provision of the service/product that is being supplied to the Arriba Group, they commit to compliance with the Modern Slavery Act 2018 and the identification and eradication of modern slavery risks in their operations and supply chains.

Review our supplier evaluation processes and form to include an assessment of modern slavery risks in supplier operations and their supply chains.