



Vision Australia Limited Modern Slavery Statement

March 2025

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Our mission

Our mission is to support people who are blind or have low vision to live the life they choose.

Our values

Our values define us as an organisation, guide our interactions with each other and govern how we work with clients.

Person centred. We measure our success in terms of outcomes for clients.

Accountable. We hold ourselves responsible for what we do and don't do.

Collaborative. We work well together and with others to deliver the best possible outcomes.

Commercially focussed. We work efficiently and responsibly to sustain and grow our services and influence.

Agile. We will adapt, learn and innovate to have a positive impact in a changing environment.

Our key principles

- Our clients are at the centre of everything we do.
- We advocate for social change so that people who are blind or low vision can live the life they choose.
- We take a business-like approach to delivering on our purpose.
- Deliver the services our clients, their families and supporters need.

Our inclusion statement

Vision Australia recognises Aboriginal and Torres Strait Islander peoples as the First Australians and the Traditional Owners of the Land on which we meet and work. We acknowledge the importance of maintaining their cultures, countries and their spiritual connection to the lands and waters, and pay our respects to Elders past, present and future. Vision Australia acknowledges and respects the genuine diversity and richness of Aboriginal and Torres Strait Islander cultures throughout Australia.

Introduction

This Modern Slavery Statement (“Statement”) is made pursuant to the Modern Slavery Act 2018 (CTH) and outlines actions taken by Vision Australia Limited (reporting entity) to identify, assess and address modern slavery risk in its operations and supplier chain. This Statement covers the activities of the following Vision Australia Group entities:

- Vision Australia Limited — ABN 67 108 391 831
- Vision Australia Foundation — ABN 91 007 428 284
- Vision Australia Trust — ABN 88 646 584 335
- Seeing Eye Dogs Australia Pty Limited — ABN 28 004 758 641
- 5RPH Pty Limited — ACN 608 798 661
- 6RPH Pty Limited — ACN 608 797 762
- Quantum Technology Pty Limited — ABN 29 001 381 728

The Statement is for the financial year July 1, 2023 to June 30, 2024 (the reporting period) and is endorsed and approved by the Vision Australia Board, which is its principal governing body.

This Modern Slavery Position Statement was approved by the Board of Directors of Vision Australia Limited on March 26, 2025.

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William Michael Jolley

Chair, Vision Australia Limited

A message from the Chair and CEO

Vision Australia’s purpose and mission of supporting people who are blind or have low vision to live the life they choose remains unwavering. As part of realising our vision, we acknowledge our responsibility towards supporting victims of modern slavery represented in the communities we service.

We acknowledge that modern slavery is a significant global human rights issue, and we remain dedicated to supporting and respecting individual dignity and human rights across the services we provide to our clients. We are committed to operating our business lawfully and ethically and only collaborating with suppliers that are aligned to our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.

We are pleased to share with you our progress over the past year in our 2024 modern slavery statement. We acknowledge that this work is part of a journey which will continue to evolve. We continue to re-review our current processes to strengthen our systems and processes to identify potential modern slavery risks and undertake range of risk reduction measures within our operations and supply chain.

We remain committed to taking action to ensure that we address and mitigate modern slavery risk in our supply chains and their operations.

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William Michael Jolley
Chair

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Justine Heath
Acting CEO

STATEMENT

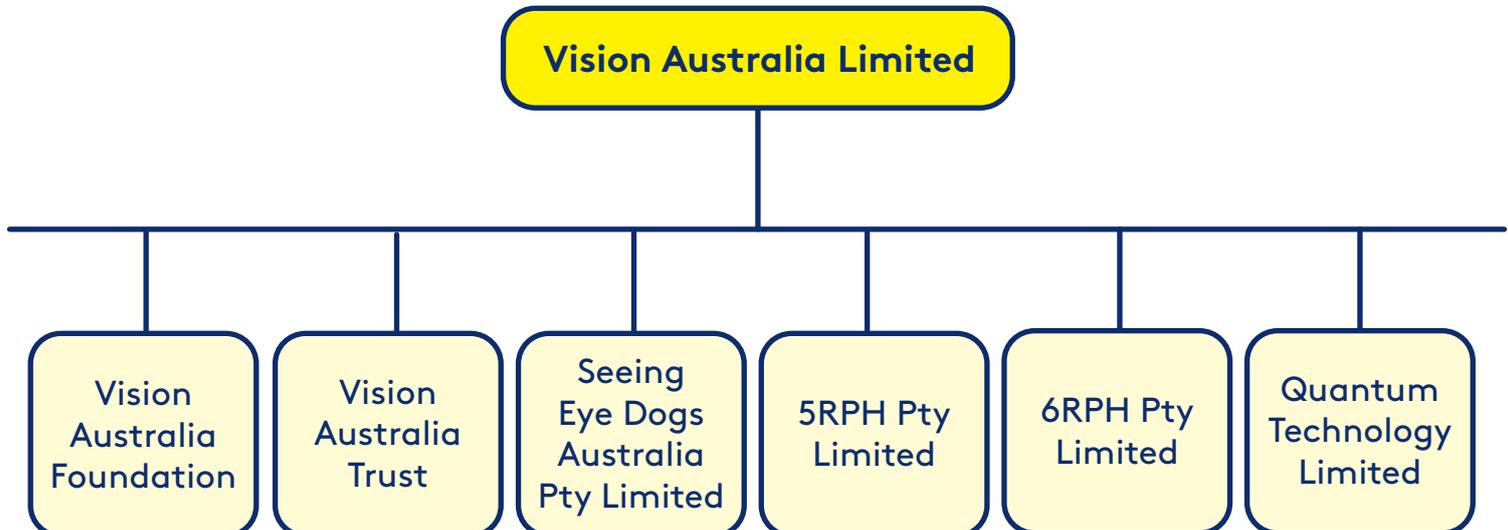
Who we are

Vision Australia Group is a leading national provider of blindness and low vision services in Australia. We are a for-purpose organisation and a major participant and partner in the international blindness community.

We support more than 25,000 people of all ages and life stages, and circumstances. We do this through more than 30 Vision Australia Group centres in Victoria, New South Wales, the Australian Capital Territory, Queensland, South Australia and Western Australia; and through outreach programs in the Northern Territory and Tasmania. We have 956 employees and around 1600 volunteers. Our annual turnover in FY2024 was \$128M.

Our organisational and governance structure

The following organisational structure is in place:



Vision Australia Limited had 100% ownership in its subsidiaries during the reporting period.

Together, the above entities make up the Vision Australia Group and is registered as a charity with Australian Charities and Not-for-profit Commission. The registered office for Vision Australia Group is 454 Glenferrie Road Kooyong VIC, 3144. All entities owned or controlled by Vision Australia Limited are included in this Statement.

The Vision Australia Board of Directors is responsible for ensuring that the Vision Australia Group has an appropriate corporate governance structure with accountability and control systems in place. Vision Australia is the sole beneficial owner of the assets of the Vision Australia Trust. The Vision Australia Foundation is the Trustee of the Trust and operates pursuant to the Trust Deed and a Charter established by Vision Australia for the conduct of the Trustee.

To assist the Vision Australia Limited Board in fulfilling its duties it has established three committees:

- audit finance and business risk committee
- client services committee
- people and culture committee.

The Vision Australia Foundation is governed by the Vision Australia Foundation Board of Directors.

The Boards are supported to conduct the operations by the CEO and Executive Leadership Team.



What we do: Our services and activities

The Vision Australia Group provides a wide range of client services and activities that our clients can access:

- **Client services and support** — this includes but is not limited to speech pathology services, occupational therapy services, physiotherapy services, orthoptist services, orientation and mobility services, social supports and wellbeing programs, industrial skills training, employment services and independent living services.
- **Technology and products** — this include a range of tools, products and technology to assist people who are blind or have low vision.
- **Business and corporate consulting** — provision of services includes digital and print accessibility, audio description, accessibility training, accessibility audit and design solutions.
- **Home Care Package program services** — Vision Australia is an approved provider of Home Care Packages.
- **New South Wales Spectacles Program** — through this program we provide government funded glasses and vision aids to eligible recipients in New South Wales.
- **Library services** — this includes audio and braille books, newspapers, magazines and podcasts for people with a print disability, unable to hold or manipulate books or unable to focus or move eyes and have a perceptual disability.
- **Fundraising** — Our fundraising activities include various fundraising campaigns and events, regular giving, one off donors, lottery programs, Gifts in Wills and philanthropic support.
- **Seeing Eye Dogs (SED)** — we are the only national breeder, trainer and supplier of dog guides in Australia.
- **Vision Australia Radio** — our radio network includes community radio stations, digital radio and podcast.
- **Advocacy** — we work for people who are blind or have low vision to address systemic barriers, through targeted lobbying and campaigning, we inform policy makers, politicians, businesses and industry groups to drive positive change across Australia.
- **Investment activities** — Vision Australia's mission is additionally funded through investment activities and include equity, alternatives, and fixed interest instruments.

Our 2023 – 2024 impact

Each year, we're fortunate to work in partnership with Australians who are blind or have low vision to support them to live the life they choose.

Whether it's at home, in the workplace, at schools and universities, or in the wider community, our staff are there to provide the blind and low vision community with the support they deserve.

Here's just some of our many achievements from the past 12 months.



39,758

clients supported



241,886
hours of service delivery



1,943
children and young people supported



16,724
hours of orientation and mobility training



49,709
hours of recreation and community support



31,696
hours of assistive technology support



42,484
hours of children and young people services



58,820
hours of occupational therapy



17,784
hours of Telelink

\$46.7m

in gross fundraising revenue

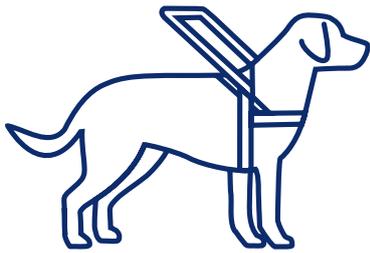


\$1m+

raised through Vision Australia's
Carols by Candlelight

\$11.4m

in revenue from over 30,000
regular giving donors



5 months

average waitlist time for a Seeing Eye
Dog, down from seven months in FY23

40+

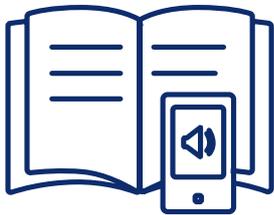
handlers matched with
a Seeing Eye Dog for the
fourth year in row

235

active Seeing Eye Dog
handlers, the most ever
across Australia

220+

Seeing Eye Dogs
puppies born

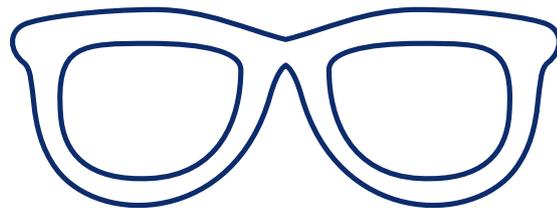


185,000+

pages produced in
alternative formats

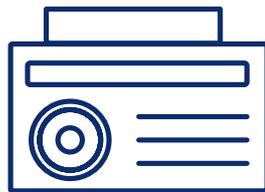
56,833

spectacles and optical aids funded through the
NSW Spectacles Program



2,500+

new titles added to
Vision Australia Library

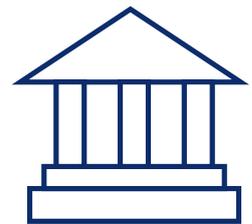


400,000

monthly listeners to
Vision Australia Radio

32

submissions made
to governments on
issues facing the
blind and low vision
community



Vision Australia's supply chain

Vision Australia as a leading national provider of blindness and low vision services in Australia provide a diverse range of services to its clients. In alignment with its services and activities, Vision Australia procures goods and services in twenty-one categories.

Main spend categories:

- blind and low vision assistive technology aids and equipment
- contingent labour and recruitment
- corporate uniform
- property and equipment hire
- financial and insurance services
- fleet
- food and catering
- fundraising support services
- Home Care Package program services
- information, communication and technology
- library service
- marketing, advertising and media
- NSW Spectacles Program services
- office consumables and printing
- postal and logistic services
- professional, consulting, legal and training services
- property management and maintenance
- SED VET clinic and supplies
- technology infrastructure and support services
- travel and accommodation
- utilities and security services.

Vision Australia procedure with over two thousand suppliers, of which approximately 95% are Australian based companies. The overseas companies that we trade with are mainly located in Germany, United Kingdom and United States. According to the 2023 Modern Slavery Index report, these countries are in the least prevalent group for modern slavery practices with strong governance and responses to modern slavery.

Governance framework

The Vision Australia Group is committed to operating our business lawfully and ethically and only collaborating with suppliers that are aligned to our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.

The Vision Australia Group has a range of policies and processes which outline our commitment to ethical business practices and compliance with applicable laws. They include:

- Procurement Policy and Procedures
- Retail Purchasing Policy
- Charter of Professional Behaviours
- Fundraising Integrity Policy
- Modern Slavery Policy
- Supplier Code of Conduct
- Investment Policy
- Whistleblower Policy
- Risk Management Policy
- Complaints and Feedback Policy
- Human Rights Statement
- Disclosure and Management of Interests Policy

Vision Australia Group has ensured its Modern Slavery Policy and Position Statement is a publicly available document.

Identifying Modern Slavery risk in our supply chains and operations

We undertook risk assessments of modern slavery risks in our operations and supply chains over the reporting period to consider the risk that we are causing, contributing, or directly linked to modern slavery practices. Following this assessment, the Vision Australia Group considers the risk of modern slavery to be low within most of our direct business operations and countries our suppliers operate from. However, the Vision Australia Group recognises the risk of indirect exposure to modern slavery and human trafficking through our supply chain.

The Vision Australia Group is not directly involved in activities such as the building construction, corporate cleaning and maintenance of office, manufacture of blind and low vision products, manufacture of IT products, fleet manufacturing, provision of services to Home Care Package clients or manufacture of uniforms. However, we do acknowledge that there are inherent risks of modern slavery within several of our key supply chains and spend categories.

During the reporting period, our team conducted a comprehensive review of the supplier listing and reorganised these suppliers into the spend categories to strengthen and simplify our risk assessment. This included developing a spend category risk matrix, detailing risk ratings and their underlying rationale and detailed guidance for managing procurement accordingly.

The table below summarises Vision Australia's spend categories that we deem to pose moderate to high risk.



Spend category	Summary	Risk Rating
Blind and low vision assistive technology aids and equipment	Due to the nature of work and material required in the manufacture of these products and the involvement of various suppliers and manufactures across various countries, there is inherent risk of modern slavery practices.	Moderate
Corporate uniform	Due to a combination of high-risk factors involved at each stage of the garment manufacturing chain - i.e. from growing and producing raw material such as cotton, to processing these into inputs and to manufacturing presents high risk for modern slavery practices.	High
Fleet	Automotive industry is quite complex and involves numerous suppliers and manufactures across various countries such as sourcing of fabric used for car seats and mining of metals for body . Modern slavery-related risks are high in this industry which include labour rights abuses and forced labour.	High
Food and catering	Due to the nature of the necessary work in the production, processing, packaging and transport of food and beverages, fresh produce, there is a high risk of modern slavery associated with food and catering. Whilst forced child labour is common in coffee industries across South and Central America and Africa; this category is deemed to have moderate risk given the abundance of more ethical options available on the market. There is also high risk of poor treatment of migrant workers in the food retail, wholesale and agriculture industries.	High

<p>Home Care Package program services</p>	<p>A range of services are provided under the Home Care Package program to clients which includes personal care, domestic support, gardening and home maintenance, social support, respite and in-home care. The majority of these services are sub-contracted and as such present base-skilled labour risk, and forced labour especially of migrant workers to reduce labour costs.</p>	<p>Moderate</p>
<p>Information, communication and technology hardware</p>	<p>Due to the combination of high-risk component parts, such as precious minerals, and high-risk production and manufacturing processes, such as mobile phones, there is high risk of modern slavery practices involved especially in high-risk geographic location and those with complex supply chain.</p>	<p>High</p>
<p>Property management and maintenance and capital works</p>	<p>Building materials — raw building materials such as bricks, cement, granite, rubber and timber are commonly sourced from countries considered high-risk for modern slavery.</p> <p>Modern slavery risks in furniture manufacturing are often linked to geographic regions.</p> <p>Facility management services – facility management services such as cleaning, security and maintenance present base-skilled labour risks, and the use of sub-contracting and forced labour by migrant workers to reduce labour costs.</p>	<p>High</p>
<p>Travel and accommodation</p>	<p>There is high-risk of exploitation within the Travel and Hotel industry due to its vulnerable workforce, complex supply chains and limited oversight from brands and multinational hotel companies as a result of extensive franchising.</p>	<p>High</p>

What we are doing to manage Modern Slavery risk

As part of the procurement process and managing the risks of modern slavery in our supplier chain, the Vision Australia Group has undertaken the following measures:

- a). Developed a modern slavery questionnaire and sent the questionnaires to suppliers that fall in the spend categories that are identified as posing moderate to high-risk.
- b). The questionnaire is designed to assess the potential risk of modern slavery in our supply chains, including geographic risks from where we source materials, the products and services that we source and the sectors that we operate in.
- c). Through the questionnaire, commenced obtaining data to evaluate the supply chain to verify and address the risks of human trafficking or slave labour.
- d). Provide training to finance procurement staff to educate on the awareness of the modern slavery requirements.
- e). Publish the modern slavery statement on the Vision Australia Group website.

All suppliers (currently providing or seeking to provide goods or services to Vision Australia Group) are identified and sent a copy of Vision Australia's Modern Slavery Policy and our Supplier Code of Conduct.

The Modern Slavery Compliance Questionnaire requires suppliers to confirm that the production and supply of goods and services supplied to the Vision Australia Group are compliant with the UN Guiding Principles on Business and Human Rights or that all efforts are being made to prevent, mitigate and, where appropriate, remedy modern slavery in the entity's operations and supply chains.

Where suppliers do not complete the questionnaire or demonstrate a lack of compliance with the UN Guiding Principles, the Vision Australia Group initially collaborates with the supplier to gain compliance and, failing that, will seek alternative suppliers.

Monitoring and reporting

In order to monitor and maintain effective records of our modern slavery compliance requirements, our finance procurement has engaged a third-party provider, Safetrac to manage the process for sending questionnaires suppliers. All evaluations and records to evidence the checks that are undertaken are maintained in Safetrac and managed by the finance procurement. The modern slavery statement provided by a supplier will be uploaded in Safetrac and flagged within the supplier records in the finance system. The Chief Financial Officer (CFO) will be notified if any suppliers are identified as high risk.

Suppliers will be audited as necessary to evaluate compliance with standards for slavery and human trafficking in our supply chains.

This means we will review and monitor our supply chain for compliance with the legislation by undertaking appropriate due diligence checks, by obtaining compliance statements from our major or higher risk suppliers, and by engaging in periodic business reviews with selected suppliers to evaluate them and the process that they have in place to comply with this requirement.

The CFO must be notified of any suspected slavery or human trafficking and will promptly validate the risk rating for any claims or allegations that a supplier is engaging in slave labour activities or human trafficking or is otherwise not complying with this policy. The CFO will escalate the findings to the Chief Executive Officer (CEO), the relevant General Manager and the Manager-in-charge of Compliance who is part of the Leadership Team (Compliance Manager). If necessary, the matter will be reported to the Audit Finance and Risk Committee and the Vision Australia Limited Board, along with the findings.

Any identification of modern slavery practice will be reported to the Australia Federal Police (AFP) by the Compliance Manager. After contacting the AFP, or in the case of practices occurring offshore, the Australian Border Force (ABF) will be contacted at slavery.consultations@abf.gov.au.

Training

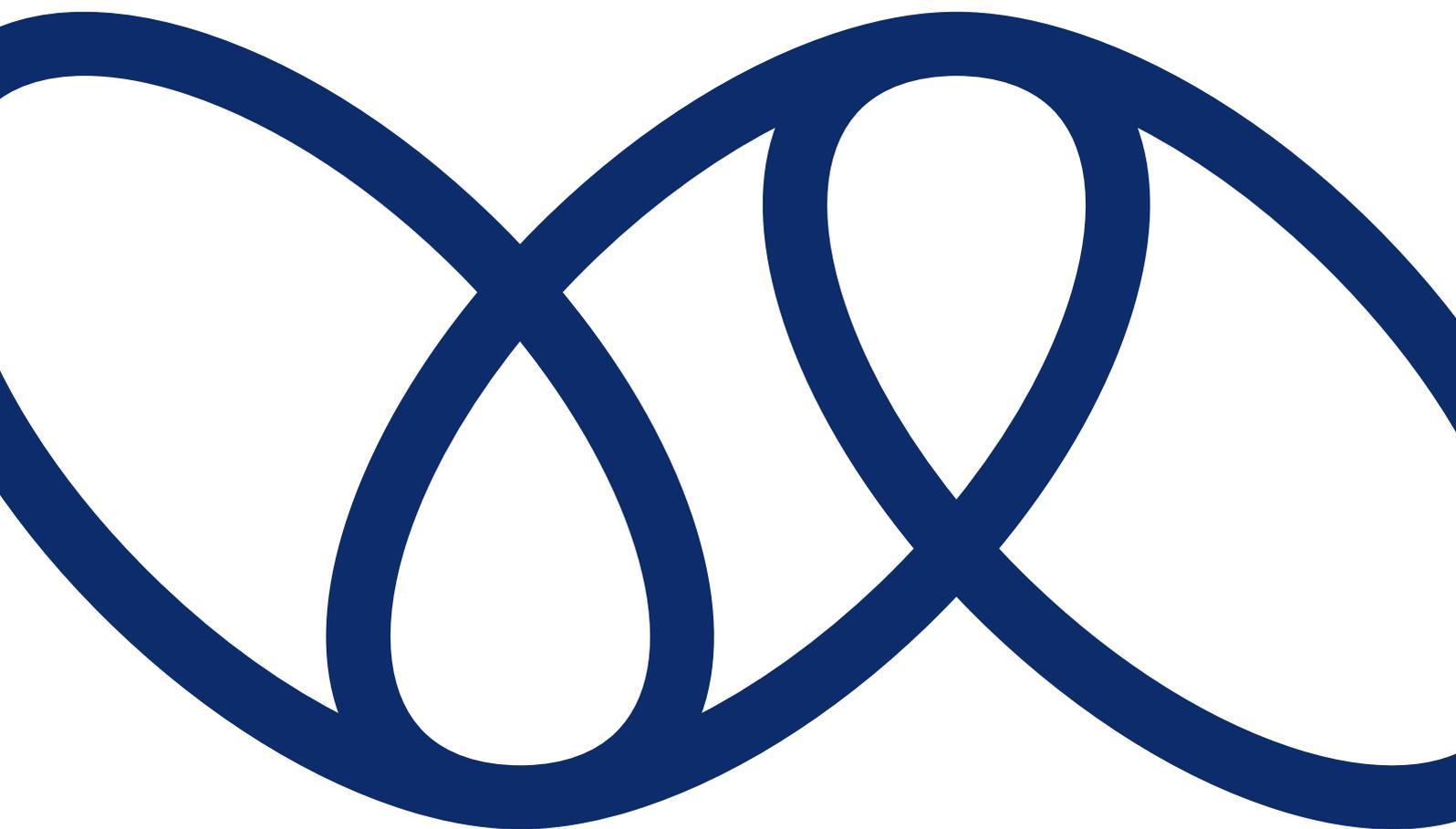
Our policies and statements are available on our intranet and website. Staff are required to familiarise themselves with this policy, our supplier code of conduct and our modern slavery statement. Specific training on eradicating slave labour or human trafficking will be expanded and made available to relevant members of staff. Any queries or questions must be directed to our purchasing email at purchasing@visionaustralia.org.

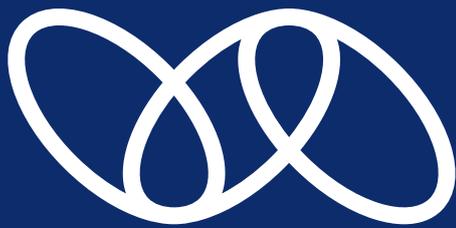
Grievance and feedback

Vision Australia Group has a Whistleblower (Protected Disclosure) Policy that allows (current and former) employees, volunteers and contractors to raise concerns in a confidential manner. Our external provider is FairCall Whistleblower Hotline (1800 500 965). This channel is available for reporting modern slavery concerns.

Employees and third parties can also raise concerns through our complaints mechanism: complaints@visionaustralia.org.







**Vision
Australia**

Blindness. Low Vision. Opportunity.