

Endeavour Foundation Group

Modern Slavery Statement

For the year ended 30 June 2022



Acknowledgement

Endeavour Foundation Group acknowledges the traditional custodians of country throughout Australia, and their continuing connection to land, water, and community. We pay our respects to them, their cultures, and Elders past, present and emerging, acknowledging their continuing relationship to this land and the ongoing living cultures of Aboriginal and Torres Strait Islander peoples across Australia.

We also acknowledge the forced labour, servitude and enslavement of Aboriginal and Torres Strait Islander peoples and Pacific Islander peoples in Australia's history. We recognise the trauma and impact those injustices have had on individuals, their families, and communities.

We acknowledge the victims and survivors of all forms of exploitation that we recognise as modern slavery.

Introduction

I am proud to lead the Endeavour Foundation Group, of our history and our ongoing commitment to advance the human rights of people we support.

We recognise our obligation to respect and defend human rights. Our Modern Slavery Statement is another means to progress the cause of human rights for all people to live in this world free of modern slavery.

In our third Modern Slavery Statement, we are pleased to be able to demonstrate progress across key areas of governance and engagement with suppliers.

For too many people, human rights remain far from guaranteed. For that reason, the Endeavour Foundation Group will not stop working towards a future where no one is a victim of modern slavery, and the human rights of all people are protected and valued equally.

David Swain, CEO

Our organisation

On 14 June 1951 a group of parents committed to creating educational options and opportunities for their children with intellectual disability and started a makeshift school on the veranda of a home in Brisbane. Endeavour Foundation was founded on the principle that people with an intellectual disability have the same rights as everybody else, starting with the basic right to an education.

Today, as an independent, not-for-profit organisation, we are at the heart of local communities – offering choice, opportunities and personalised support to more than 21,000 people across Australia.

We collaborate with people we support to help make their possibilities a reality - at home, at work, through education and training and in the community.

For more information about our organisation, please refer to our [Annual Reports](#).

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Our organisational structure

Endeavour Foundation Group (ABN 80 009 670 704) is a not-for-profit organisation, incorporated as a public company limited by guarantee and domiciled in Australia. Endeavour Foundation Group is a Registered Charity with the Australian Charities and Not-for-Profits Commission (ACNC). Endeavour Foundation Group's registered office is 33 Corporate Drive Cannon Hill, Queensland 4170.

The Endeavour Foundation Group controls four (4) entities which are incorporated in Australia and registered with the ACNC. They are:

- Endeavour Foundation Disability Research Fund Limited
- Endeavour Foundation Disability Research Fund Trust
- Community Solutions Group Limited
- BRACE Education, Training & Employment Limited

Our governance framework

Endeavour Foundation Group is committed to good governance. A volunteer Board of Directors, both elected and appointed, govern the way we operate. They provide a balance of corporate expertise and lived experience of disability. The following Board committees assist with providing governance oversight:

- Audit & Risk Committee
- Client Services Committee
- Information & Communication Technology Committee
- Nominations, Remunerations & Governance Committee.

Endeavour Foundation Group's governance arrangements are set out in our Constitution. In addition, all Directors, Executives, and employees are required to meet standards of conduct and behaviour set out in our Code of Conduct.

Our Executive Leadership Team includes the CEO and leaders accountable for:

- Service Delivery
 - Community Solutions Group
 - Home and Community
 - Work
- Advocacy, Communication and Engagement
- Finance and Infrastructure
- Legal and Governance
- People and Wellbeing
- Strategy, Marketing and Fundraising.

Endeavour Foundation Group's Members, 10 Area Committees, and National Council are enshrined in our Constitution, and we also work with local Support Groups to partner with families and carers.

To learn more about our governance framework, visit our website, [About Us](#).

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Our values, code of conduct and policies

Our values, Code of Conduct and policies set our behavioral standards and provide guidance for anyone who works at Endeavour Foundation Group.

All employees are responsible for knowing the ethical, legal, and policy requirements that apply to their jobs and reporting any suspected breaches of law or our code.

Our executives and leaders are accountable for creating and promoting a workplace environment in which compliance and ethical conduct are expected.

Our values

Our values describe what we stand for and guide the way we do things. They are an integral part of how we represent ourselves.

We share and live these values which convey a genuine, trustworthy, and honest face of our organisation. We have four core values – Care, Imaginative, One, and Passionate.

Code of conduct

Our Code of Conduct guides our actions, words and behaviours. It helps us take a consistent approach to ethical, legal and compliance issues. We require everyone – our Board, CEO and leadership teams, staff, and volunteers – to abide by our Code of Conduct.

Our code is underpinned by the National Disability Insurance Scheme (NDIS) Code of Conduct that promotes safe and ethical service delivery.

Policies

Our policies cover many important elements about how we work, including key elements on behaving ethically and lawfully.

Policies and procedures outline key responsibilities and actions. They are regularly reviewed to ensure they align with best practice and all relevant regulatory requirements.

Our supply chain

Endeavour Foundation Group takes our partnership with suppliers very seriously. This enables us to make more informed purchasing decisions to progress the eradication of modern slavery throughout our supply chain.

Our assessment of approximately 2,500 suppliers with an annual spend over \$100mil (excluding GST) has shown us that over 95% of our suppliers are Australian based, while less than 100 are based overseas. More than 80% of our procurement spending is concentrated on our largest 107 (4.2%) of suppliers.

The diversity of the products, markets and regulatory requirements associated with these purchases can potentially expose Endeavour Foundation Group to many risks.

To help us make more informed purchasing decisions, we will continue to refine our approach to assess any modern slavery risks within our supply chain as part of our selection

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and contract renewal process. We work with our suppliers to assess whether they are meeting our standards using a combination of:

- due diligence activities such as desk top research, questionnaires, and documentary review
- signed contracts with ‘high risk and valued’ suppliers, formalising their responsibilities and liability to comply with the Modern Slavery Act and to take reasonable steps to ensure that there is no modern slavery in their supply chains or in any part of their business.

Endeavour Foundation Group defines ‘supplier’ as any entity that supplies goods or services to any of our Group Organisations registered with the ACNC.

Modern slavery risk for the Endeavour Foundation Group

Modern slavery encompasses criminal offences relating to deprivation of civil liberties, human trafficking, forced marriage and child labour, but does not extend to unlawful practices that do not otherwise have elements of slavery, servitude, or debt bondage.

The “risks of modern slavery” means the potential for the Endeavour Foundation Group to cause, contribute to, or be directly linked to modern slavery through its operations or supply chains – in other words, risks that Endeavour Foundation Group may be directly or indirectly involved in modern slavery.

Endeavour Foundation Group’s key modern slavery risk area is the ability to identify suppliers, who cause, contribute to, or are directly linked to, modern slavery. To address this key risk area, we continue to develop our Supply Chain Assurance program to reduce our exposure to modern slavery risk through improved risk assessment, due diligence, and remediation processes.

Risk management and due diligence

The identification, analysis, and management of modern slavery risk

- falls within our broader approach to human rights risk, and
- is assessed and managed consistent with our established enterprise-wide risk framework.

Endeavour Foundation Group’s Audit and Risk Committee is responsible for providing oversight on behalf of the Board.

Whilst we recognise that modern slavery risks may occur in our organisation and extended supply chain, we also know that the level of risk is influenced by factors such as vulnerable populations, product and service category, industry, and geographic location.

Accordingly, we have tailored our risk processes to ensure that we focus our efforts on those areas that present an elevated risk of exposure. We have assessed that the greatest risk of modern slavery – among all products and services we procure – occurs within the categories of textiles, information technology supplies and labour intense services.

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Endeavour Foundation Group's Procurement Policy provides consistency and control over procurement activities and helps ensure the products and services we purchase will meet our duty of care and safety obligations.

Our effectiveness

Our modern slavery risk management action plan and due diligence processes are reviewed regularly as part of our risk management framework requirements. COVID-19 restrictions hampered many of our usual activities; however, we were able to provide ongoing quality support in our Home and Community, Work, and Community Solutions areas in a safe and supportive environment.

Stakeholder engagement and collaboration

A key feature of our approach to the eradication of modern slavery will be our cooperation with suppliers to effect change. We view collaboration and partnerships as integral to reducing modern slavery risk among collective supply chains and we will seek to improve on this coordinated approach to drive change.

Training

We continue to build the awareness of global modern slavery and helping the organisation to better understand, identify and report incidents.

We will invest time and resources to build our people's understanding of international standards of human rights, including modern slavery of those in our supply chain, and their capability to implement appropriate solutions to address risks.

Our achievements

Since the publication of our first Modern Slavery Statement in March 2021 we have:

- Reviewed Endeavour Foundation Group's first Modern Slavery Policy
- Made it an ongoing requirement for our suppliers and commercial customers to complete our modern slavery questionnaire
- Responded to our commercial customers to meet their modern slavery requirements
- Incorporated modern slavery due diligence into our contracting processes
- Established key performance indicators to monitor effectiveness of modern slavery actions,
- Identified and actioned gaps through our supplier questionnaire, and
- Worked with suppliers to address modern slavery risks.

Looking to the future

Endeavour Foundation Group acknowledges our continual improvement processes are required to increase the transparency of our suppliers and their suppliers, to identify and eradicate modern slavery risks through our Supply Chain Assurance Program.

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Our focus is based on continual improvement and to cement our modern slavery obligations into our current processes:

1. We are **developing a risk-based due diligence process** to determine the level of due diligence required based on the level of risk our suppliers pose, associated supply chain risks and human rights risks.
2. Suppliers will be reviewed under our **due diligence process** prior to onboarding, contract award or contract renewal.
3. Suppliers are requested to complete a **modern slavery questionnaire** to assist us in determining whether they have identified and are mitigating their modern slavery risks.
4. We **work with suppliers** to resolve or substantially mitigate issues, rather than simply ending the relationship with the supplier, because of the potential adverse impact on the livelihood of the supplier's employees.

This above constitutes the updated version of the Endeavour Foundation Group Modern Slavery Statement of for the year ending 30 June 2022.



Richard Haire
Board Director

17 October 2022