

Settlement Services International Limited

Modern Slavery Statement 2024 - 2025



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1. Introduction

Settlement Services International Limited (SSI) (ABN 38 031 375 761) is a national not-for-profit (NFP) organisation whose purpose is to help create a more inclusive society in which everyone can meaningfully contribute to social, cultural, civic and economic life. We work towards this goal by delivering life-changing human and social services on behalf of governments and other nongovernment organisations and also using our own funding channels.

SSI and its subsidiary entities (**SSI Group**) are committed to combatting modern slavery in our operations and supply chains. This is SSI's sixth Modern Slavery Statement, prepared pursuant to the Modern Slavery Act 2018 (Cth) (the **Act**). In describing the actions taken by SSI Group to assess and respond to modern slavery risks during the financial year ending 30 June 2025, the Statement addresses the following key criteria.

- SSI Group's structure, operations and supply chains
- the actions taken by SSI Group to assess the risks of modern slavery in our operations and supply chains
- the actions taken to address these risks
- how SSI Group assesses the effectiveness of these actions.

2. About Us

The SSI Group is one of the largest providers of support services for migrants, refugees and asylum seekers in Australia. The SSI Group takes an integrated approach to its work, striving to understand how each individual can thrive within the community in which they live – and the wider Australian society.

While we have maintained our initial focus on assisting those on humanitarian visas, we today work with a wider group of people experiencing vulnerability to build capacity and enable them to overcome inequality. These include refugees, people seeking asylum and culturally and linguistically diverse (CALD) communities, people living with disability, Aboriginal and Torres Strait Islander communities, women, youth, families and children, and LGBTIQ+ communities

By accessing federal and state funding as well as private philanthropy, we're able to provide pathways to employment and education as well as health and support services for our clients. Our own social enterprise operations complement our social service delivery areas and ensure that we remain a client-centred organisation.

The SSI Group is committed to strive to act ethically and with integrity in all business relationships and to implement and enforce effective systems and controls to reduce the risk of modern slavery in the organisation and its supply chains.

The following sets out the mission, vision and values of the SSI Group.

Our mission: *We support newcomers and other vulnerable Australians to prosper. We build our sector's capacity and create positive, social outcomes with government, corporations, and communities.*

Our vision: *To achieve a society that values the diversity of its people and actively provides support to ensure meaningful social and economic participation and to assist individuals and families to reach their potential.*

Our values: *Respect, accountability, and inclusion.*

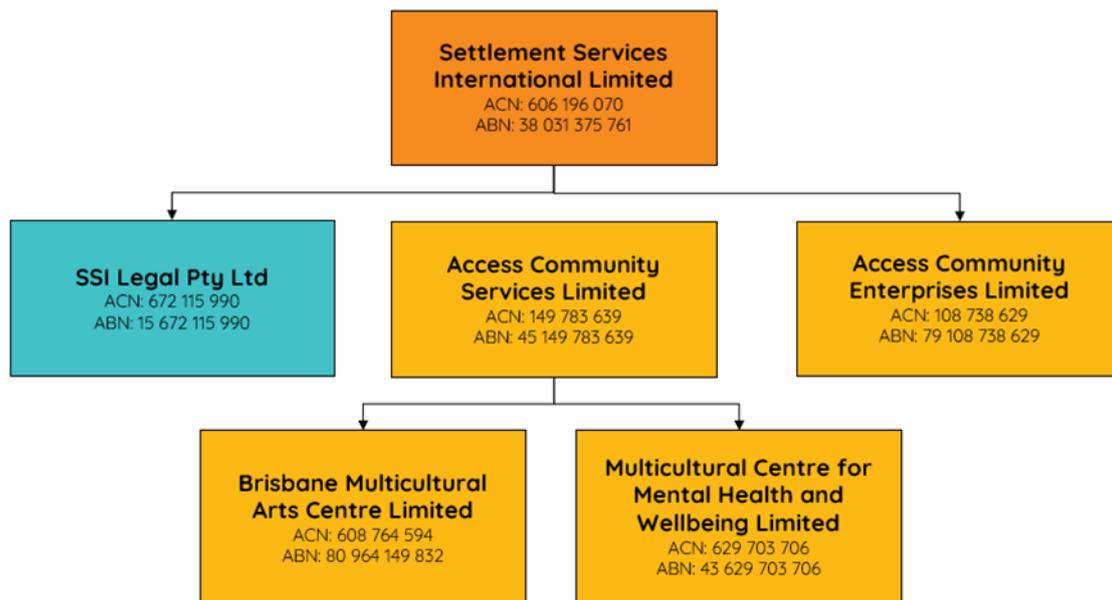
2.1. Organisational structure

SSI is a company limited by guarantee and registered under the Corporations Act 2001 (Cth). SSI is also a public benevolent institution registered with the Australian Charities and Not-for-

Profits Commission (ACN 606 196 070). SSI’s head office is in the Sydney suburb of Ashfield, located at Level 2, 158 Liverpool Road, Ashfield, 2131. SSI has five subsidiaries as outlined below. At the end of the 2025 financial year, the SSI Group, including SSI’s subsidiaries, employed 1050 staff and operated out of 40 metro and regional NSW, Queensland and Victorian offices and locations.

The SSI Group Board of Directors is responsible for the overall governance of the organisation and is the decision-making body for the SSI Group. Board Committees assist the Board in fulfilling its corporate governance and oversight responsibilities in relation to risk and compliance obligations. The SSI Group Chief Executive Officer (CEO), Violet Roumeliotis, is accountable to the Board and leads SSI’s Executive Team.

The SSI Group has a robust organisational structure and governance capability, including SSI Group-wide policies, procedures and systems, operating within strong audit and risk management frameworks.



2.2. SSI’s Subsidiaries

Except for SSI Legal Pty Ltd, SSI’s subsidiary entities are all not-for-profit (NFP) companies limited by guarantee registered with the Australian Charities and Not-for-Profits Commission, which operate under a mirror board structure.

All SSI subsidiary entities are managed centrally through the parent company (SSI). None of SSI’s subsidiaries are reporting entities themselves under the Act. Further the SSI Group financial systems and management processes are integrated and are managed centrally. Accordingly, this Statement reports on risks and actions taken across the whole SSI Group, including SSI’s subsidiary entities.

SSI’s subsidiary entities during the 2024-2025 reporting period were as follows.

Table 1: SSI’s subsidiaries

Entity details
<p>Access Community Services Limited (ACSL)</p> <ul style="list-style-type: none"> • ABN 45 149 783 639 • ACSL is a community based, not-for-profit organisation committed to development and capacity building. ACSL has over 30 years of experience providing services to migrants, refugees and Australian-born clients • 95 staff members

Entity details
<p>Access Community Enterprises Limited (ACEL)</p> <ul style="list-style-type: none"> • ABN 79 108 738 629 • ACEL assists culturally and linguistically diverse (CALD) and mainstream clients with hands-on experience, relevant skills and continual career support to facilitate long-term employment • 4 staff members
<p>SSI Legal Pty Ltd (SSI Legal)</p> <ul style="list-style-type: none"> • ABN 15 672 115 990 • SSI Legal provides dedicated support and cost-effective solutions to immigration legal matters. SSI Legal is fully owned by SSI. • 5 staff members
<p>Brisbane Multicultural Arts Centre Limited (BEMAC)</p> <ul style="list-style-type: none"> • ABN 80 964 149 832 • BEMAC is a subsidiary of ACSL. BEMAC offers programs and activities to diverse communities to encourage inclusion and self-development in collaboration with ACSL • 7 staff members
<p>Multicultural Centre for Mental Health and Well Being Limited (MCMHWL)</p> <ul style="list-style-type: none"> • ABN 43 629 703 706 • MCMHWL is a subsidiary of ACSL that provides support in NDIS, mental health, and care coordination to people from all walks of life • 0 staff members

In addition to the SSI brand, the following brands were associated with the SSI Group during the reporting period:



2.3. Operations

Community is at the heart of what we do. Our services are delivered through a range of programs including:

- Settlement support services for new arrivals to Australia
- Social inclusion and community engagement programs
- Community health and wellbeing programs, including domestic and family violence
- Disability services including NDIS Local Area Coordination services
- Multicultural Foster Care programs
- Employment services
- Entrepreneur support services through the Ignite program
- Recruitment services, through the Work+Stay program
- Arts and culture programs
- Training services
- Housing support services, and
- Capacity building programs and advocacy efforts.

To support service delivery and corporate functions, the SSI Group operates in metropolitan and regional NSW, Victoria, and Queensland including Melbourne, Sydney, southwest Sydney, Newcastle, Armidale, Coffs Harbour and Logan.

Our operational activities include the following:

- **Direct employment of workers:** To achieve our purpose, the SSI Group engages a wide range of professionals including case workers in both settlement and foster care, community engagement and development officers, National Disability Insurance Scheme local area coordinators, youth workers and employment consultants. In addition, the SSI Group has a significant flexible workforce of Multicultural Support Officers. The service delivery workforce is supported by a Corporate Office function.
- **Engagement of volunteers**
- **Leasing of property:** The SSI Group's Housing Programs support clients with securing short- and long-term accommodation – some of these programs involve the leasing of properties by the SSI Group, which are then sub-leased to clients.
- **Research:** The SSI Group collaborates with other NFPs, research organisations and universities to conduct research and participate in research to better understand the needs and aspirations of the communities it serves.
- **Fundraising and charitable activities:** The SSI Group engages in charitable activities beyond its normal provision of services. This includes seeking funding from donors and corporate partners for the provision of initiatives such as scholarships for refugees, sponsorship of arts and culture festivals, other community engagement activities, as well as in-kind donations for goods and services.
- **Other operations:** SSI works to influence domestic and global policy which impacts migrants, refugees and asylum seekers. SSI participates in key global forums, provides thought leadership and contributes to capacity building of the sector through key partnerships.

2.4. Supply Chains

In line with SSI's community focus, purchases by the SSI Group are often made locally in metro and regional areas where the SSI Group operates, however, purchases are also made internationally, particularly for software licensing and information technology and communications (ITC) goods and services.

As reported in the last Statement, major spend categories include subcontractor costs, including salaries and services costs, ITC goods and services used by SSI Group staff, leased property costs, including office spaces and housing for clients, consumer and white goods for clients, communications, consultants and utilities.

3. Actions taken to assess risks

3.1 Supplier Assessment

Gathering data from suppliers

SSI Group seeks to engage constructively with suppliers. Since 2022, the key to this approach has been our partnership with the Informed 365 Modern Slavery Working Group (the Purpose consortium), utilising the Informed 365 Platform. Through the Platform, the contact details of SSI's selected suppliers are uploaded, enabling a validated questionnaire to be forwarded to suppliers, as well as timely reminders for completion. The Platform enables completed questionnaires to be subsequently shared with other consortium members, thus reducing the burden on suppliers and creating an incentive for engagement and completion.

SSI staff attend the monthly Informed 365 consortium meetings to gain a deeper understanding of efforts to combat modern slavery, increase supplier engagement and the work to achieve better risk assessments and enable system users like SSI to build a more informed risk analysis.

Response rate

Despite best efforts, a low response rate from suppliers has been an ongoing barrier to the assessment of risk.

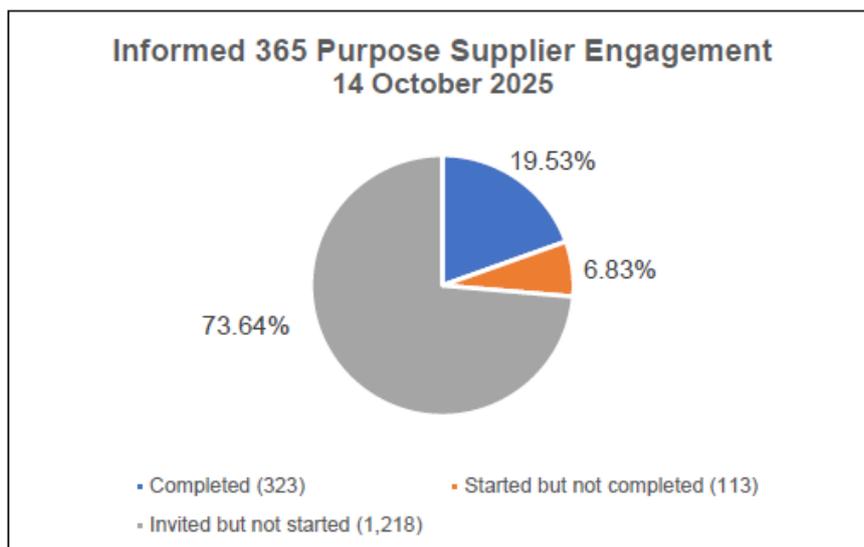
In 2024, in an effort to address this barrier, increase the response rate, promote supplier engagement and enable accurate, data-driven risk assessments, SSI revised our approach in the following ways:

- The supplier data, including contact data was cleansed
- The timeframe for distributing the questionnaires was reset to align with business needs
- Information provided to suppliers was revised to explain the context and clarify requirements
- A central point of contact was established at SSI to manage queries.

To make better use of SSI's resources and based on learnings to date, the current supplier list was reviewed to consider which category of supplier should be the focus of efforts. The decision was made to send questionnaires to:

- Those supplying more than \$10,000 in goods and services to SSI
- Those delivering cleaning and catering services (32 suppliers)

As a result of these efforts, SSI's response rate increased to 18%, in line with the response rate achieved across the Purpose Consortium (see below).



Calculation of risk

Informed 365's calculation of the supplier's risk of modern slavery is based on the country where the supplier's business is based and the industry in which they are engaged. None of SSI's supplier's risks have been rated above moderate, however no specific issue requiring action has been raised.

3.2 Understanding risks in our operations

SSI Group seeks to ensure that our staff are equipped to undertake due diligence to enable risks within our operations to be identified and mitigated. This includes risks associated with our employment programs, partnership arrangements, recruitment of volunteers and students, and work with vulnerable populations, including those located overseas etc.

SSI Group staff undertake mandatory modern slavery training every two years via an e-learning module developed internally. The specific learning outcomes of the training are:

- Recognise what is modern slavery
- Understand why modern slavery is relevant to our organisation
- Understand what SSI Group is doing to address modern slavery
- Understand the responsibilities of SSI Group staff and equip them to raise concerns to ensure appropriate action is taken

Staff are required to complete an assessment task to confirm their understanding of the e-module.

In addition, SSI's Group's Strategies to Prevent (**SToP**) Modern Slavery Project, funded by National Action Plan to Combat Modern Slavery 2020-25 Grants Program delivered interactive modern slavery "Lunch n' Learn" sessions to staff. These sessions, and other information about SSI's response to the risks of modern slavery, remain available to staff through our intranet.

3.3. Modern Slavery risks identified

SSI is aware of the inherent risks of modern slavery across a range of industries including information technology and cleaning services. We are also aware that our operations may be impacted by risks related to the engagement of subcontractors in service delivery and the vulnerability of the communities we serve.

As we engage with multinational suppliers to source smartphones, laptops etc for staff, SSI requests new suppliers to provide their modern slavery statement or includes our modern slavery clause in the contract. It is difficult to influence larger suppliers such as Microsoft, Salesforce etc, so we are obliged to rely on their published undertakings to combat modern slavery in their supply chains.

The cleaning industry is recognised as a high-risk industry for modern slavery. Given the large number and dispersed nature of our sites, SSI engages a number of cleaning providers, many of which are small operations. A total of 25% of these suppliers completed the questionnaire. In declining to do so, one supplier noted: *"Thank you for the email, unfortunately this is not something we need to complete as a small business. All of our answers would predominately be N/A."*

To better understand the risks within the cleaning industry, our Facilities team has accessed the specific training provided through the Australian Human Rights Commission. Going forward we will review the effectiveness of our current approach in combatting risks in this sector and consider engaging with these suppliers in different ways.

The SSI Group also acknowledges that utilising a range of subcontractors and suppliers to deliver services directly to clients increases the risk of modern slavery within our operations. We are currently reviewing the effectiveness of our approach to ensure that any risks that may arise are addressed.

Most importantly, SSI is keenly aware that the communities we serve, new arrivals to Australia, those with limited English language skills, limited education and limited employment choices, are likely to be more vulnerable to exploitation and the risk of modern slavery. A grant awarded by the Federal Government's National Action Plan to Combat Modern Slavery 2020-2025, has enabled SSI Group to deliver the SToP Project. The Project aims to build the capacity of multicultural communities to increase awareness and implement strategies to combat and reduce modern slavery in Australia. Culturally appropriate information and awareness raising sessions focussing on forced marriage, servitude, trafficking, and serious exploitation of labour have been delivered to targeted communities in schools and settlement and migrant organisations across Queensland, New South Wales and Victoria.

4. Enabling concerns to be raised

4.1 Within the supply chain

SSI Group's contract terms require suppliers to raise concerns of modern slavery. Suppliers are required to:

- Represent, warrant and undertake that they conduct their business in a manner that is consistent with the principles of any applicable Modern Slavery laws, even if they do not have a statutory duty to comply with such laws
- Take reasonable steps to:
 - assess, address and reduce any risks of modern slavery or human trafficking in their supply chains or in any part of their operations
 - ensure that each of their consultants, subcontractors, agents and suppliers also conduct business in the manner described above (noting that this may require them to review contractual arrangements with their own suppliers), and
 - notify the SSI Group if they become aware of any actual or suspected modern slavery practices in their own operations or in a supply chain that has a connection with their arrangement with the SSI Group.
- Comply with any requests by the SSI Group to provide evidence of their assessment of modern slavery risks in their supply chains.

Adherence to these terms is audited.

4.2. Across our operations

Recruitment and Employment

For a number of our staff, SSI is their first employer in Australia. SSI's commitment is to maintain the diversity of our workforce, strive to create safer, healthier workplaces, and encourage learning and personal growth among individual staff members. In addition to the SSI Group's recruitment policy that mandates Criminal History and "Working with Children" background checks, and "right to work" compliance checks, SSI Group staff are employed or contracted in accordance with the Fair Work Act 2009 (Cth), industry awards where applicable (such as the SCHCADS award) and Work Health and Safety laws. SSI Group's Flexible Working Policy exceeds the terms of the Fair Work Act 2009 (Cth) and award standards.

SSI Group's staff is protected from modern slavery through the organisation's adherence to legislative and regulatory requirements relevant to workforce management. Issues may be raised through SSI Group's Grievance Resolution Policy and Procedure and all SSI Group staff are supported by a highly qualified People and Culture team, whereby working conditions and concerns are acknowledged and resolved.

The SSI Group's standalone Whistleblower Policy provides a formal and confidential mechanism for staff and other stakeholders to report suspected misconduct and improper affairs, which may

include identified risks of modern slavery practices. All staff are required to complete the online Whistleblowing Training course provided by the SSI Group. To ensure the effective implementation of the policy, additional training is provided to executive staff and members of the Board.

Staff are also consulted about their experiences of working at SSI Group through comprehensive staff-wide surveys, providing them with an opportunity to raise concerns.

Client services

Through SSI's mandatory e-learning training program and other mechanisms, SSI Group aims to ensure staff are aware of and understand the risks and consequences of modern slavery for the communities we serve, and also where to access assistance for those impacted.

If staff have concerns, especially in relation to our clients, they are encouraged to escalate this to their manager and raise a client incident report. This will enable the incidence of harm to be recorded and the response to be monitored.

Where a modern slavery risk is identified or suspected, the SSI Group will work with relevant agencies to better understand the risk and develop a remediation plan, if appropriate.

5. Other activities in the current period

During the FY 2024-25, the SSI Group has worked to strengthen our understanding of modern slavery risks and review our strategies to drive change in our operations and supply chains. We have undertaken the following actions during this period:

- Refreshed the mandatory online training module for staff to ensure currency
- Revised our internal policy and procedure to improve guidance to staff. Key changes included adding modern slavery as a client incident reporting category to enable required actions to be tracked and trends monitored. Links to the agencies providing support for victims of modern slavery were also included.
- Revised our supplier communication strategy to promote engagement and awareness.
- Submission made to the Parliament of NSW's inquiry into modern slavery risks faced by temporary migrant workers in rural and regional New South Wales. Our submission, aligned with the *Victims' Rights and Support Act 2013* (NSW) and outlined key reform "asks".
- Engaged with the NSW Anti-Slavery Commissioner (Commissioner) through the CEO of SSI as an active member of the NSW Advisory Panel on modern slavery.
- This allowed an opportunity to focus on strengthening collaboration between the newly appointed Federal Anti-Slavery Commissioner, the Hon. Christopher Evans and the NSW Anti-Slavery Commissioner, including alignment of priorities, coordinated campaigns, and shared advocacy objectives across jurisdictions. SSI contributed evidence and policy insights informed by SSI's SToP Project, gender-based violence initiatives, and extensive frontline experience with newcomers.
- Responded to the Australian Anti-Slavery Commissioner's invitation for input regarding the Strategic Plan 2025-2028.
- Continued to deliver on the National Action Plan to Combat Modern Slavery 2020-25 Grants Program to work with multicultural and other communities at risk of modern slavery. Through the SToP Project, SSI published a series of short videos explaining the three forms of modern slavery in simple, relatable terms, using examples developed in partnership with communities. These videos can be used in group discussions or as a self-reflective exercise, and some are also available in Arabic, Dari and Chinese.

6. Learnings and opportunities

In common with many organisations, SSI Group faces challenges in identifying the specific risks of modern slavery as they relate to our supply chain.

Prior to the commencement of the reporting period, SSI Group reviewed past practice and considered what steps could be taken to improve supplier engagement in order to uncover risks in the supply chain and work to address these. While the response rate has reached the sector standard, more work can be done.

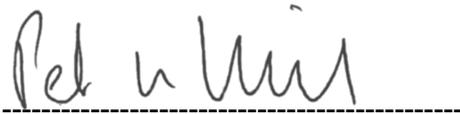
In relation to our cleaning suppliers, business owners will be required to complete a declaration prior to engagement confirming they are not engaged in modern slavery and also undertake the available industry training to raise their awareness of risks and ensure that their staff are aware of the relevant agencies providing support to victims.

SSI Group is well positioned to engage with community partners to build awareness of the risks, to identify those at risk, and assist victims to access support.

7. Authorisation

Principal Governing Body Approval

This modern slavery statement was approved on 28 November 2025 by the principal governing body of SSI as the 'higher entity' within the SSI Group, as that term is defined in section 14 of the Act, and is signed by a responsible member of SSI in accordance with the Act.



Signature

Peter van Vliet

SSI Chair

28 November 2025