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# Modern Slavery Statement

## For the financial year ended 30 June 2024

Level 4, 507-509 Kent St  
Sydney NSW 2000  
[www.altius-group.com.au](http://www.altius-group.com.au)





## MANDATORY CRITERIA

# Identify the reporting entity

Altius Group is the reporting entity that has prepared this Modern Slavery Statement for the financial year ended 30 June 2024 (FY24).

The Altius Group consists of the Parent Company, Altius Holdco Pty Ltd (ABN 22 646 640 280) and all subsidiaries, namely:

### Parent Company

Altius Holdco Pty Ltd

### ABN

22 646 640 280

### Operational Entities

### Business Name

Altius Group Holdings Pty Ltd

Altius Group by Altius,  
Health, Safety and Wellbeing by Altius, and HSW by Altius

99 603 911 020

Altius Group Pty Limited

AltiusLife

87 123 631 676

Ayres Management Services Pty Ltd

AMS Consulting Group (Aust)

45 087 711 644

Career Shift Pty Ltd

Career Shift, and Realm Rehab

84 161 037 841

CIM Group Holdings Pty Ltd

Disability Employment Services by Altius, and  
CIM Employment by Altius

13 607 671 198

Executive Health Solutions Pty Ltd

Executive Health Solutions Australia, The Health Assessment  
Centre, Life First, Executive Health Management, Executive  
Health Management Australasia, Wesley Corporate Health,  
and Wesley Executive Health

99 099 055 553

Innovative Physiotherapy Services Pty Ltd

Nabenet, and Nabenet Health

29 103 180 034

Occhealth Network Pty Ltd

Occhealth by Altius

64 123 632 388

Ontime Health Agency Pty Ltd

Ontime Healthcare, Ontime Homecare, and On Time Nurses  
and We Care 4 U

81 612 474 398

Ontime Medical Reports Pty Ltd

International Independent Medical Examiners IIME

31 612 807 851

PeopleSense Pty Ltd

PeopleSense by Altius

88 103 691 916

Rehabilitation Services Pty Ltd

Rehabilitation Services by Altius

99 124 265 523

Risk Consulting by Altius Pty Ltd

Psychological Health Interventions by Altius

84 092 603 382

### Service Entities

Altius Bidco Pty Ltd

28 646 640 744

Altius Group Services Pty Limited

66 123 922 761

Altius Midco Pty Ltd

92 646 640 637

Forean Holdings Pty Ltd

68 098 191 970

Nabenet Holding Pty Ltd

38 137 597 589

Ontime Diversified Pty Ltd

79 610 339 154

## MANDATORY CRITERIA

# Describe the reporting entity's structure, operations and supply chains

Altius Group is a leading integrated workplace health and wellbeing organisation. We provide premium end-to-end solutions to support businesses and people in restoring their physical and mental health. Altius Group's purpose is to elevate the wellbeing of every person, business and community.

### Our Services include:

**Workplace Services**  
We work with organisations to ensure the workplace is safe, and the health and wellbeing of their employees is elevated. Our Services include: Workplace Health and Safety, Occupational Rehabilitation Services, Wellbeing Services, Organisational Psychology, Return to Work Coordination, and Independent medico-legal assessments.

**People & Employee Services**  
At an organisational level, we support healthy workplaces. On an individual level, we help to optimise client's mental health and wellbeing. Our services include: Employee Assistance Programs, Critical Incident Response, Movement and Work Conditioning Programs, Mediation, Therapeutic Services, and Mental Health treatment.

**Executive Health Solutions**  
Executive Health Solutions provides comprehensive health assessments and targeted health management programs either as a combined package or as a standalone service.

**Medical Specialists**  
IIME provides the services of medical specialists for medico-legal assessments. Clients receive detailed, high quality and unbiased reports, and informed, clear, patient-focused independent medical opinions.

**Disability Services**  
We are a NDIS accredited therapy provider and a Disability Employment Services provider. We deliver person-centred programs to those living with a disability. In addition, we also provide in-home personal care and domestic assistance services to the aged care sector. Ontime Healthcare, supplies Nurses and Personal Care Assistants to a range of clients including hospitals, residential aged care facilities, and correctional facilities.

### Our Brands:



As a multidisciplinary team of health professionals including Doctors, Occupational Therapists, clinical and organisationally-trained Registered Psychologists, Physiotherapists, Exercise Physiologists, Osteopaths, Vocational and Career Professionals, and Workplace Rehabilitation Counsellors, we are able to work collaboratively to develop and deliver tailored, timely, and holistic solutions.

The Altius Group employs over 800 team members in full-time, part-time, and casual roles. Team members work in over 95 offices, geographically spread across Australia, including all the state and territory capital cities.

Altius Group is committed to managing our business in a manner that reflects our high ethical and moral values, and we are committed to upholding human rights, fair working conditions, and environmental protection.

## MANDATORY CRITERIA

# Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

Altius Group operates multiple business units across the allied healthcare industry, its supply chain is managed centrally by the Finance team who are well trained in the understanding of modern slavery risks.

### Risks in Operations

Altius Group is compliant with Australian employment law and professional practices for the recruitment, remuneration, and working conditions, of employees. On an ongoing basis, employees' remuneration is mapped to relevant award rates to ensure compliance and no gaps in compensation. Altius Group have appropriate policies and procedures in place to ensure the protection and fair treatment of its employees. These policies include:

- Work Health and Safety Policy
- Recruitment and Selection Policy
- Professional Development Policy
- Promotions Advancement and Transfers Policy
- Diversity and Inclusion Policy
- Personal Safety Policy

There is minimal risk in relation to modern slavery in our employment practices and operations.

### Risks in Supply Chains

The majority of goods and services procured for Altius Group are from suppliers located in Australia. For FY24, 1.2% of suppliers were located overseas in countries that have a low prevalence and low vulnerability to modern slavery in accordance with the *Walk Free Global Slavery Index* (<https://www.walkfree.org/global-slavery-index/map/#mode=map>).

Our main suppliers come from the following industries:

- Building and construction
- Commercial property rent and building maintenance
- Hospitality and cleaning
- Human resources and recruitment
- Information technology
- Insurance, professional services, and consulting fees
- Marketing and communications
- Motor vehicle
- Office supplies
- Telephone and internet
- Travel

We have performed a review of all suppliers to Altius Group for FY24, and based on the industry they belong we have completed an assessment of our risk in regard to modern slavery in our supply chain. Those industries considered higher risk are Cleaning and Information Technology. Following a review of our spend, we can conclude that there is only a small proportion in the high-risk category.

	POTENTIAL HIGH RISK	POTENTIAL MEDIUM RISK	POTENTIAL LOW RISK	TOTAL
Spend Categories	Hospitality and Cleaning	Information Technology, Human Resources and Recruitment	Insurance, Professional Services, Consulting Fees, and Other	
% of spend	1.4%	23.5%	75.1%	100%

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## MANDATORY CRITERIA

# Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

### Risks in Operations

Altius Group provides workers with entitlements in compliance with relevant laws. Altius Group ensures workers are correctly engaged as either employees or independent contractors, and appropriate remuneration equal to or above minimum wage standards and entitlements, including applicable superannuation, are paid accordingly. A register of contractors is maintained. On an annual basis, Altius Group performs a full review of salary and other remuneration benefits to ensure all staff are paid above or equal to award and are receiving their full entitlements. Altius Group have a dedicated People & Culture team monitoring legislative and market changes.

During the year, Altius Group also undertook a full review of independent contractor agreements and arrangements to ensure arrangements are not in breach of its modern slavery policy.

Altius Group will continue to monitor remuneration and working conditions. Our commitment is to continue acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our business.

We believe we have the policies and systems in place to clearly identify any inappropriate employment practices, or contractor relationships, and identify, assess, and monitor potential risk areas.

We did not identify any modern slavery risks in operations in FY24.

### Risks in supply chains

During FY24, Altius Group conducted a survey of its largest suppliers regarding modern slavery risk within their supply chain. The survey responses indicated that there was minimal risk within the supplier entities or their operations.

Altius Group has conducted further due diligence on its suppliers including mapping to industry sectors they belong to and interrogating their modern slavery risk in their own organisation and supply chain. As part of these investigations into the Altius Group supply chain, consideration was given to the products being acquired and their source of production.

Altius Group has made a conscious effort in FY24 to purchase from local, regional, and small business suppliers. As stated previously, Altius Group have over 95 offices nationally, many in regional New South Wales, Victoria, and Western Australia. Wherever possible local small business suppliers have been sourced to service our office needs. There is greater transparency regarding modern slavery risk with small business suppliers.

Altius Group has also engaged with social enterprise suppliers for its office fit-out and furniture acquisition requirements. These actions will be further progressed in FY25.

Information Technology forms a large part of the Altius Group spend each year. To ensure those in our IT supply chain comply with our values, prior to entering into agreements, we conduct vendor risk assessments which ensure clearly defined ethical working practices are in place.

Altius Group has also raised awareness amongst its own employees to understand modern slavery issues to help mitigate risk. All team members on-boarded are provided guidance with our policies and procedures including our

### [Ethical Sourcing and Modern Slavery Policy](#).

The Altius Group [Procurement Policy](#) ensures the appropriate level of management is required for authorisation of all purchases, and that key ethical considerations form part of this approval.

We will continue to educate by providing relevant training to our team members.

We have zero tolerance to modern slavery. Following an investigation, any employee who breaches the [Ethical Sourcing and Modern Slavery Policy](#) will face disciplinary action, which could result in dismissal for misconduct.

Altius Group's [Whistleblower Policy](#) provides a mechanism through which any unethical, unlawful, or undesirable conduct can be reported without fear of intimidation or retaliation. The [Whistleblower Policy](#) provides details of the dedicated External Reporting Service through which reports can be made.

Should modern slavery risks be identified in our supply chain, these would be thoroughly investigated, engagement with the supplier would be terminated and information would be passed onto government authorities.

In FY24 Altius Group did not identify any modern slavery risks in its supply chain.

For FY25 it is planned that the Altius Group Accounts Payable system will be updated to include modern slavery questionnaires as part of the onboarding process of suppliers, to ensure modern slavery risk is minimised before engaging a supplier.

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## MANDATORY CRITERIA

# Describe how the reporting entity assesses the effectiveness of these actions

Altius Group has reviewed the response rate and data disclosed on supplier questionnaires. Given the response rate level and thoroughness of the questionnaire responses, it was concluded that this was an effective method of interrogating suppliers.

Altius Group has become more engaged with their suppliers, in particular working in partnership with suppliers relating to the acquisition of IT software and hardware. IT software and hardware is critical to our operations and cyber risk is also a growing risk factor that requires appropriate controls. By working with, testing, and gaining an understanding of our IT suppliers' fundamentals, this reduces both modern slavery and cyber risk. That way, we have obtained more detailed knowledge of the operations of our suppliers and their modern slavery risk.

There have been no obvious modern slavery risk factors or suspicions as a result of our investigations with suppliers. We will continue to work with our suppliers to identify any risks, and should such risks be identified, they will be investigated appropriately.

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## MANDATORY CRITERIA

# Describe the process of consultation with any entities the reporting entity owns or controls

(a joint statement must also describe consultation with the entity giving the statement)

The Modern Slavery Statement has been prepared collaboratively with the Altius Group Leadership Team, inclusive of the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, and all Executive General Managers of operational entities. This report covers Altius Holdco Pty Ltd and its wholly owned subsidiary entities.



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## MANDATORY CRITERIA

# Provide any other relevant information

Altius Group will continue to monitor for modern slavery risks and take mitigation action where necessary.



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## Conclusion

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* for Altius Group and relates to the financial year ended 30 June 2024.

This statement was approved by the Altius Group Board on 27 November 2024.

**Nicole Mills**

Company Secretary  
Altius Holdco Pty Ltd