

# 2026 MODERN SLAVERY STATEMENT



*Redempta felt helpless as her 5-year-old son Blaise was gradually losing his sight. Cataract surgery gave them hope for a better future*



The Fred Hollows Foundation

*Lien, from Oudomxay in Lao PDR, can return to work after cataract surgery. "It's like a new life for me"*





## INTRODUCTION

The Fred Hollows Foundation (The Foundation) remains steadfast in its commitment to protecting human rights and eliminating modern slavery in all its forms. This statement, prepared in accordance with the Australian Modern Slavery Act 2018 (Cth), outlines the actions we have taken during the reporting period 1 January to 31 December 2025 to identify, assess, and address modern slavery risks across our operations and supply chains.

The Foundation condemns all forms of modern slavery and is committed to respecting human rights, acting ethically and transparently, and continuously improving how we prevent, detect and respond to modern slavery risks within our sphere of influence.

In this Statement we refer to **Modern Slavery** using the definition by the Australian Government: forcing someone to work, marry or do other things through coercion (like manipulation, control or violence), threats or lies. In situations of modern slavery, one person uses their power over another to control or use them for their own benefit. It takes away someone's freedom to make choices for themselves. Modern Slavery can take many forms, including:

- human trafficking
- slavery
- slavery-like practices:
  - forced labour
  - forced marriage
  - servitude
  - debt bondage
  - deceptive recruiting
- the worst forms of child labour<sup>1</sup>

<sup>1</sup><https://www.modernslavery.gov.au/australias-response/laws-and-policies/modern-slavery-act>

*All images in this statement are representative of The Foundation's work generally and do not reflect people who have experienced modern slavery.*

*Den, 82, regained her independence after her sight was restored. She underwent cataract surgery after a screening for older people in central Vietnam*



## OUR ORGANISATION

### WHO WE ARE

The Foundation is a global development organisation working to end avoidable blindness and improve eye health worldwide. The Foundation is independent, not-for-profit, politically unaligned and secular.

The Foundation is fully accredited by the Australian Government through its Department of Foreign Affairs and Trade (DFAT) and is a recipient of funding under DFAT's Australian NGO Cooperation Program. Accreditation provides DFAT and the Australian public with confidence that the Australian Government is funding professional, well-managed organisations that are capable of delivering quality development outcomes, are accountable to their stakeholders and managing risk<sup>2</sup>. The Foundation is also a signatory to the Australian Council for International Development's (ACFID) Code of Conduct.

### OUR VISION

A world in which no person is needlessly blind or vision impaired.

### OUR GOVERNANCE STRUCTURE

The Foundation is constituted as a public company, limited by guarantee under the Corporations Act 2001 (Cth). A membership-based, not-for-profit and non-government organisation, The Foundation is

registered with the Australian Charities and Not-for-profit Commission (ACNC).

The Foundation is overseen by a voluntary Board of Directors (Board), which includes 12 directors as at 31 December 2025, and CEO Ross Piper leads day-to-day operations. The Board meets at least quarterly and is responsible for, amongst other things:

- Maintaining good governance and providing responsible, ethical and creative leadership;
- setting strategic directions and policies;
- ensuring appropriate financial and risk management strategies;
- overseeing and protecting the broader resource base and reputation of The Foundation;
- providing accountability to members and stakeholders; and
- ensuring compliance with relevant standards, regulations and reporting requirements.

The Fred Hollows Group consists of related entities in Australia, Hong Kong, Kenya, UK and USA. The Foundation also has a minority interest in a Singapore entity, Alina Vision, with eye health operations in Vietnam. These entities come together in a governance model based on principles of tight integration and local empowerment.

Caring about other people is what being a human is all about”

– Professor Fred Hollows

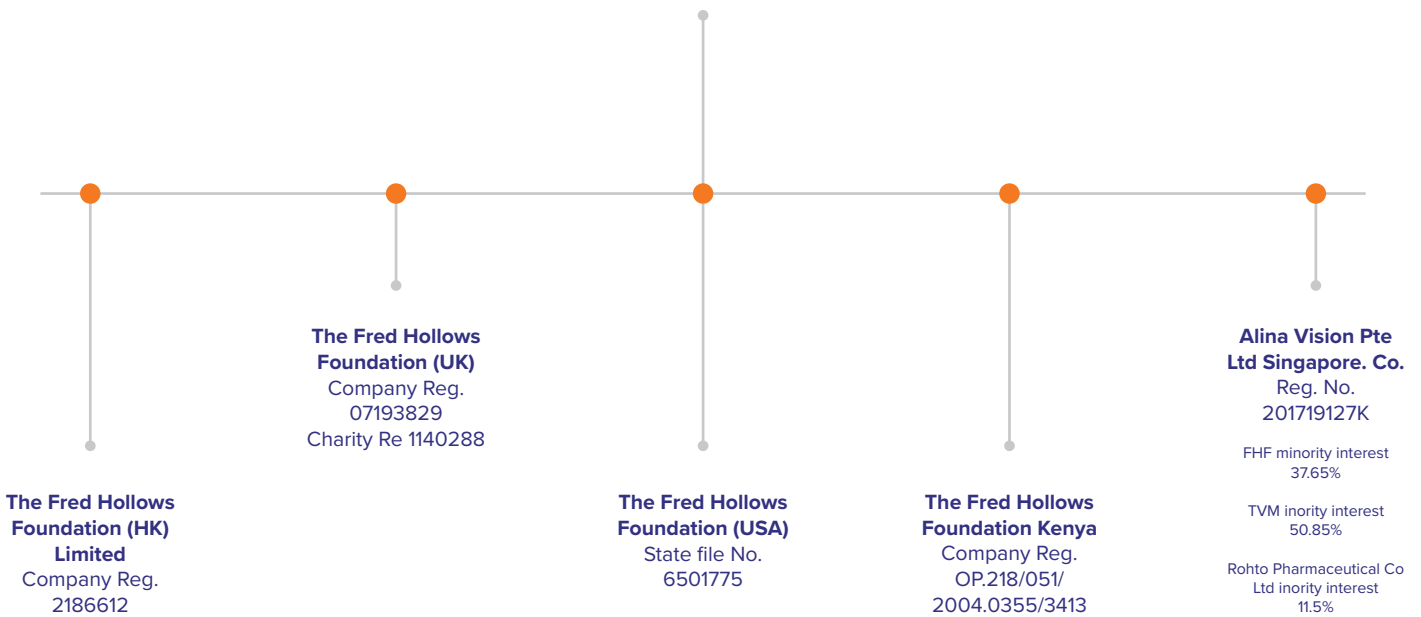


## THE FRED HOLLOWES FOUNDATION GROUP

Last updated May 2026

### The Fred Hollows Foundation

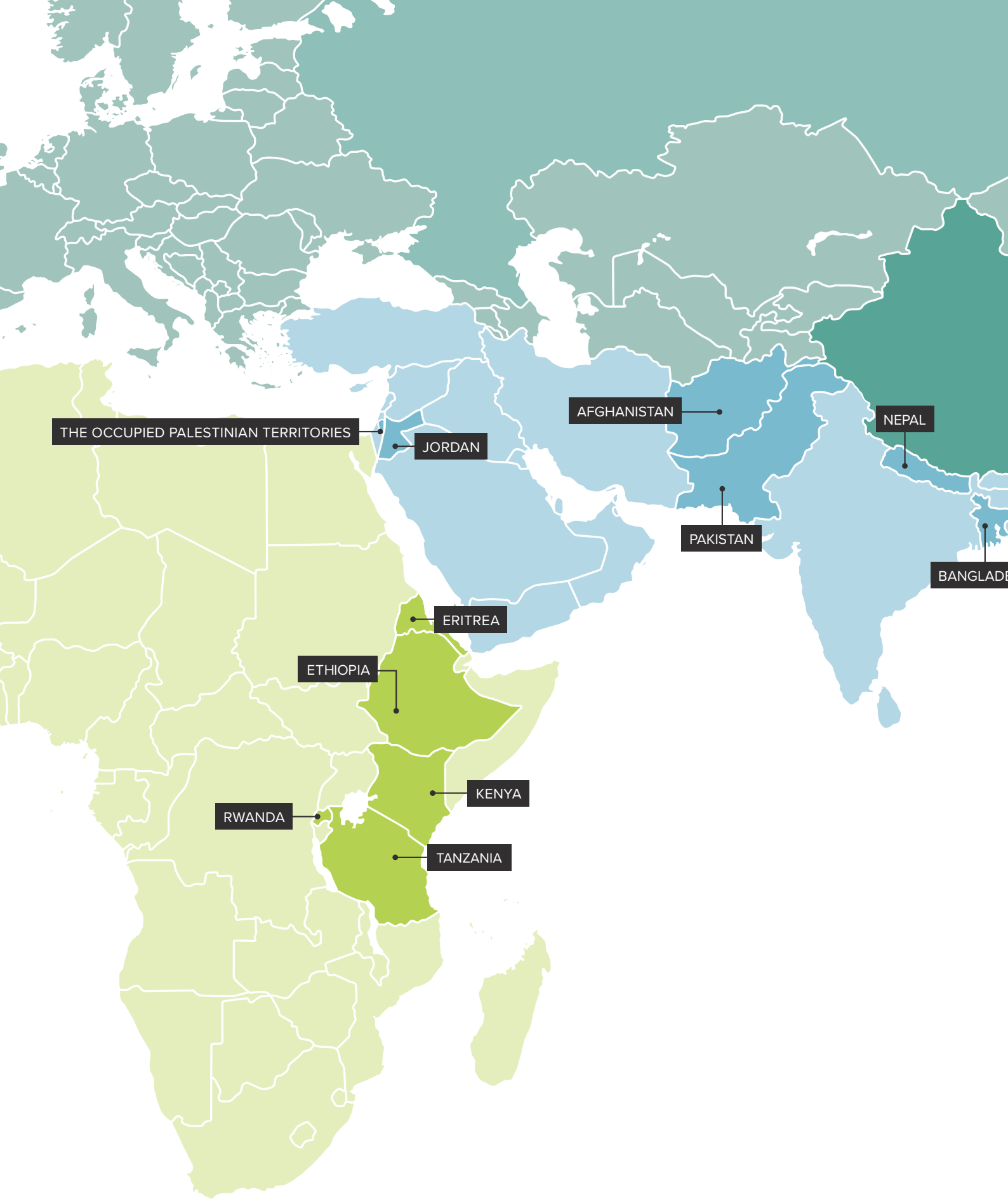
ACN 070 556 642

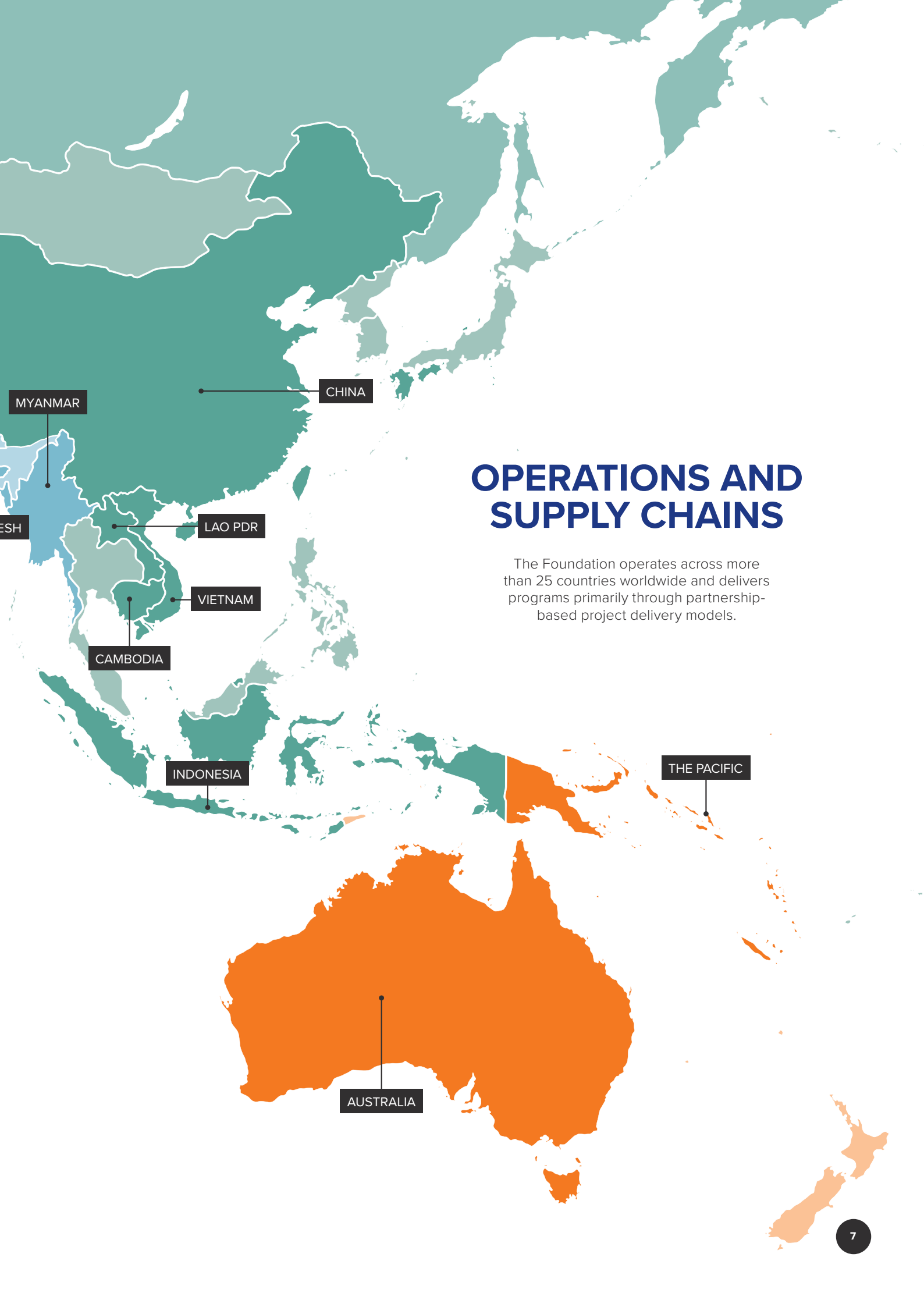


## LEADERSHIP CHANGES IN 2025

In 2025, The Foundation strengthened our governance and operational capacity through significant organisational changes. We welcomed Ross Piper as our new Chief Executive Officer and advanced our

localisation strategy by appointing two executive-level roles in-country—one in China and one in Ethiopia. These changes ensure that decision-making is closer to the communities The Foundation serves and reinforce our commitment to ethical and sustainable practices.





# OPERATIONS AND SUPPLY CHAINS

The Foundation operates across more than 25 countries worldwide and delivers programs primarily through partnership-based project delivery models.

MYANMAR

CHINA

LAO PDR

VIETNAM

CAMBODIA

INDONESIA

THE PACIFIC

AUSTRALIA



*Eye health coordinators Nicole Byrne (left) and Jeriah Coutts support Aboriginal and Torres Strait Islander people in remote parts of Queensland access eye health care*

Our workforce predominantly comprises professional, technical and administrative staff based in Australia and our local country offices. Our staff undertake program management, finance, legal, technical advisory, monitoring and compliance functions rather than frontline service delivery.

We provide funding to partners in accordance with agreed budgets and milestones, commonly through reimbursement-based arrangements but sometimes through controlled cash advances. We oversee the partners' performance of the project activities through regular program engagement, financial and performance reporting, auditing and site monitoring.

### Supply Chains

The Foundation's supply chains are predominantly indirect and service-based, reflecting its partnership-led operating model. In limited cases, The Foundation directly procures goods (such as medical or specialist equipment) either for its own operational use or on behalf of partners. All such procurement is governed by our Sustainable Procurement Framework, which consists of five core elements:

1. Our Procurement Policy
2. Our Working Together Principles
3. Our Value of Purchase Guidelines
4. Procurement Process
5. Procurement Manual

### Partner Organisations

The most significant element of our supply chains is our network of partner organisations operating in Australia and more than 25 countries world-wide. These partners include:

- Government ministries, government funded hospitals and other government organisations (approximately 70%)
- NGOs
- Private and community-based organisations, including privately funded hospitals

Partners are responsible for engaging their own employees, contractors and volunteers, where approved, subcontractors. We do not directly employ or contract any of the personnel involved in the frontline delivery of our projects.

### Goods and services

To support program delivery and enabling functions, The Foundation procures a range of goods and services including:

- medical consumables, pharmaceuticals and optical or medical equipment
- freight, logistics and warehousing services
- information and communications technology goods and services
- professional services
- facilities-related services
- fundraising and marketing services
- travel and accommodation services

Medical and other major equipment is typically procured either by our partners with funds provided by us or by procured directly by us for use by partners in project, dependent on the project and risk profile.

### Subcontractors and downstream suppliers

Our partners are required to seek our consent to engage subcontractors to support project activities.



*Ruth, 7 and her 2-year-old brother Vincent developed cataract and faced a life of blindness unless they could access surgery. After surgery Ruth is excelling at school and Vincent back playing with friends*

## MODERN SLAVERY RISKS

The Foundation is not aware of any substantiated allegations or incidents of modern slavery having been raised through The Foundation's Speak Up function during this reporting period. While no actual instances have been identified, The Foundation recognises that potential modern slavery risks may nonetheless exist, particularly given its geographic footprint, operating contexts and partnership-based delivery model of the programs. These risks are managed within The Foundation's partnership-led operating model, which embeds contractual human rights, safeguarding and integrity obligations in all standard partner and supplier agreements.

### 4.1 Geographic footprint

Our exposure to modern slavery risks arises primarily through overseas partners and suppliers and third-party activities, rather than through our direct employment practices. Our supplier and partner base is concentrated in jurisdictions with developing, fragile and conflict-affected contexts which consistently assessed as higher-risk for modern slavery including:

- **East Africa:** Ethiopia, Kenya, Rwanda, Tanzania
- **East Asia:** Cambodia, Vietnam, Philippines, Lao PDR, China
- **South Asia and the Middle East:** Bangladesh, Myanmar, Pakistan

In these jurisdictions, modern slavery risks may arise from:

- Weaker labour protections are often weaker;
- Weaker regulatory environments;

- Conflict or displacement;
- Higher levels of informal employment amongst our tier 2 suppliers;
- Reliance by partners or suppliers on subcontracted or casual labour in the service delivery; and
- Economic vulnerability of workers.

The potential modern slavery risks that arise in these jurisdictions may include forced labour, debt bondage, child labour, exploitation recruitment practices, restrictions on freedom of movement, and unsafe or abusive working conditions within supply chains.

### 4.2 Partner-Managed Workforce Risks

The most significant potential modern slavery risk identified relates to The Foundation's partner-led program delivery model. As The Foundation does not directly employ frontline workers, there is a risk that modern slavery practices could occur within partner-managed workforces or partner supply chains, particularly in high-risk jurisdictions, without The Foundation's direct knowledge.

Some frontline roles within partner health facilities, such as ophthalmologists and other clinical specialists, are highly trained and professionally regulated, and therefore present a lower inherent risk of modern slavery. However, modern slavery risks may be heightened in ancillary and contracted roles within these facilities, such as cleaning, security, catering or maintenance services, which are often outsourced, labour-intensive, and may involve lower-paid workers. These risks may be heightened where partners:

- operate with limited human resources capacity;
- rely on informal labour arrangements;
- engage community workers, volunteers or incentive-based staff; or
- subcontract activities to local service providers.

Thus, while clinical delivery itself carries lower risk, there remains potential exposure to modern slavery risks within partner-managed subcontracting arrangements.

#### 4.3 Risks in Supply Chains

The Foundation's supply chains are predominantly indirect and service-based, with most procurement for frontline program delivery undertaken by partners using Foundation funding.

Nonetheless, The Foundation has identified close to 2,500 suppliers across the world.

Modern slavery risks may arise within:

- medical consumables, pharmaceuticals and equipment supply chains;
- hospitality, travel, logistics and freight services;
- construction, facilities, cleaning and maintenance services; and
- manufacturing or trading suppliers in higher-risk countries.

These sectors are recognised globally as having higher inherent modern slavery risk, particularly where labour-intensive processes and subcontracting are common.

Risks may occur beyond first-tier suppliers in complex, multi-tier supply chains.

#### 4.4 Risks in International Operations and Workforce Practices

The Foundation's direct employment practices are considered low risk for modern slavery. The Foundation employs professional, technical and administrative staff and operates under applicable workplace laws and internal governance frameworks. Nevertheless, risks may still arise through:

- suppliers of facilities, cleaning, catering or event services;
- labour hire or subcontracted professional services; and
- overseas service providers supporting corporate functions.

The Foundation engages third-party agencies to deliver face-to-face fundraising services in Australia and Hong Kong. Fundraisers engaged by these agencies are

typically classified as independent contractors and may be remunerated through commission-based or performance-linked payment models. The Foundation recognises that this arrangement can present modern slavery and labour exploitation risks, particularly where workers may be economically vulnerable and performance-based payment models may lead to low or unpredictable income or undue pressure to perform.

The Foundation seeks to mitigate these risks through due diligence of fundraising agencies, contractual safeguards regarding protection of human rights and oversight over the fundraising activities. During the reporting period, The Foundation also planned a review of all contractor and third-party labour arrangements across its operations to identify risks associated with the use of independent contractors.

#### 4.5 Limitations on Risk Identification

The Foundation acknowledges that:

- visibility beyond Tier 1 suppliers and partners is limited;
- reliance is placed, in part, on partner self-reporting and contractual assurances; and
- modern slavery risks can be hidden and difficult to detect.

Accordingly, the identification of risks in this Statement is risk-based and not exhaustive.

### ACTIONS TAKEN

During the reporting period, The Foundation undertook and progressed the following measures as part of a risk-based and continuous improvement approach. The Foundation continues to prioritise ethical sourcing and supplier engagement to mitigate the risks of modern slavery within our operations and supply chains.

#### 5.1 Governance and accountability

We strengthened governance and operational capacity through organisational changes, including a new Chief Executive Officer and in-country executive appointments. Further, a Head of Risk, Integrity and Safety and a Global Safeguarding Manager commenced in early 2026, strengthening oversight of risk management and safeguarding.

#### 5.2 Supplier Engagement

We commenced a pilot high-risk supplier questionnaire to support assessment and monitoring of supplier practices and inform supplier engagement and risk treatment actions where required.

### 5.3 Supplier Due Diligence & Contracting Protections

All third parties, including implementing partners, recruitment agencies, and employees, are screened through the World Check One platform for alerts relating to human trafficking offences and other areas of concern.

We continue to incorporate our Supplier Code of Conduct (Working Together Principles) in all goods and services agreement templates. These Principles outline our commitment to ethical conduct regarding Prosperity, People and Planet.

The Foundation also began plans for a review in the 2026 Reporting Period of all consultancy agreements for employment-related risks.

### 5.4 Training and capacity building

We delivered two global safeguarding partner training sessions incorporating modern slavery awareness, reaching 173 participants across the global network. Targeted training was also delivered for staff involved in procurement in Bangladesh and Pakistan.

### 5.5 Grievance mechanisms

The Foundation maintains grievance and Speak-Up mechanisms that enable concerns, including those relating to exploitation or labour practices, to be raised and addressed. These mechanisms are supported by safeguarding and risk management processes.

The Speak-Up function is accessible on The Foundation's official website: [Complaints Policy | The Fred Hollows Foundation AU | The Fred Hollows Foundation AU](#)

### EFFECTIVENESS

Considering our sphere of influence, we acknowledge that the impact of our actions is limited. Our focus, therefore, is measuring the effectiveness of our actions through tangible direct outcomes, including the reach of our training programmes, supplier engagement levels, and internal governance enhancements. The participation of 173 individuals in safeguarding training demonstrates our commitment to building capacity across our global operations.

Additionally, while the continued rollout of the supplier questionnaire demonstrates our proactive approach to risk identification and mitigation, we currently do not have sufficient data to accurately measure supplier engagement. This will be closely monitored throughout 2026 and in subsequent years.

### FUTURE COMMITMENTS

Looking ahead, we will expand the high-risk supplier questionnaire pilot and deliver improved targeted training for staff and partners. We will also enhance safeguarding systems to ensure comprehensive protection against modern slavery risks.

The Foundation is also considering:

1. engaging a third party platform (such as Fair Supply or Informed 365) to assist with the review of modern slavery risks in our tier 1, 2 and 3 supply chains; and
2. preparing local-language translations of our Speak Up and other relevant policies for frontline workers in local jurisdictions to understand.

### CONSULTATION

This statement was developed in consultation with key internal stakeholders, including our Risk, Safeguarding & Procurement staff.

Given the nature and structure of The Foundation, being that all related entities are wholly owned or controlled subsidiaries or where The Foundation is a minority shareholder, specific entity consultation is deemed to be not required.

### APPROVAL

This statement has been approved by the Board of The Fred Hollows Foundation on 27 May 2026.

**Jane Madden, Chair**

27 May 2026



*"I wish I could play like other kids." Mbaruku's blindness left him isolated but five years after cataract surgery is back at school and performing songs for visiting VIPs*



**The Fred Hollows  
Foundation**

1800 352 352 | [hollows.org](http://hollows.org)