



Independence Australia Group Ltd.
Modern Slavery Statement
2024 - 2025

About Us

Independence Australia is a social enterprise that provides choices for people with a disability or other personal need, enabling them to regain and retain their independence within an inclusive community.

We're a national business distributing products to hundreds of thousands of customers across Australia. Funds generated from the sale of personal health and wellbeing products, mobility aids and equipment support the delivery of essential programs to help enhance the lives of people living with a disability or other personal need.

As a leading supplier of continence aids, wound care, nutrition, skin care, mobility and daily living aids, we understand the complexities and challenges that our customers can face when finding the right solution for them.

We're committed to working collaboratively alongside people with disabilities and older people, their families and carers to plan and provide quality services and products that respond to their individual needs, goals, and choices.

Our unique social enterprise approach leverages the sale of health care products to support our core charitable purposes.

Our Values & Guiding Principles

We value equity, empathy respect and quality. To demonstrate our commitment to these values, we adhere to the following guiding principles.



Customer Centric

Ensuring that customers have choice and control is paramount in our decision making.



Valued People

We are inclusive, diverse and ensure the safety and wellbeing of our people.



One Organisation

Sharing a common purpose supported by positive contributions, clear responsibility and cooperation.



Strive for Excellence

We value and reward innovative thinking, proactivity, resourcefulness, responsiveness and accountability.

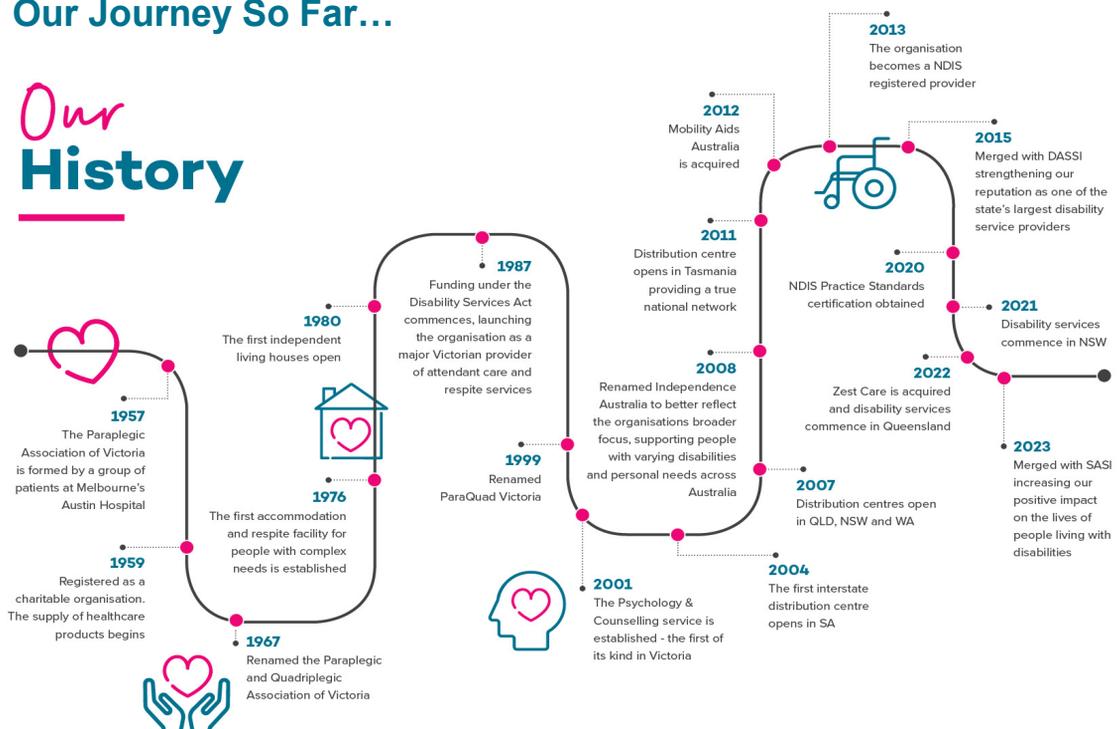
Strategic Focus

- Putting our **customers first** in everything that we do
- Leveraging our related **social enterprise** capabilities to support our core charitable purpose
- Delivering a sustainable **social impact** that improves the wellbeing of people within the community
- Ensuring **good governance** that guides the organisation to ensure it delivers on its core purpose



Our Journey So Far...

Our History



Our Position on Modern Slavery

“The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.”¹

Independence Australia recognises the important role we play in respecting and promoting human rights and eradicating modern slavery. Modern slavery is a global, complex problem, best tackled by vigilance and a collective and collaborative commitment to ending these forms of conduct.

The challenge in achieving this end is fully appreciated, given the significant reliance on the candour of third-party stakeholders, such as suppliers, service providers and contractors.

Disclosure Note *This statement has been prepared by Independence Australia Group Ltd. This Statement covers all entities owned or controlled by Independence Australia. This statement is approved by Independence Australia’s Board of Directors, however it is substantively reliant on the information provided by third parties (i.e. suppliers, service providers & contractors).*

¹ Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities, May 2023

1. Reporting Criteria

1.1 The Reporting Entity

Independence Australia Group Ltd.

1.2 Structure, Operations & Supply Chain

Independence Australia Group Ltd (ACN: 004 979 837) is a public company, limited by guarantee, registered with the Australian Charities and Not-for-profits Commission (ACNC).

Independence Australia’s governance arrangements are outlined in our Constitution. All members of the organisation are required to meet the standards as set out in our Code of Conduct.

The Board’s structure is described below with several responsibilities delegated to the Executive Team. The Board is also supported by Board Sub-Committees, which comprise members of the Board and Executive Team and are set out below:



Our Operations

Independence Australia Group operates the following businesses and services:

Independence Australia Services

- Statewide provider of in-home and community supports, specialist disability accommodation and supported independent living options, psychology & counselling and specialist support groups for Victorians living with a disability
- Transport Accident Commission sponsored program, SpinChat raises awareness, promotes prevention, and educates secondary school students about spinal cord injury

Zest Personalised Care

- In-home & community supports, support coordination and plan management provider for people with a disability across New South Wales and Victoria.
- Family Services including alternative care arrangements, supervised contact, respite, restoration and mentoring for vulnerable children, young people and their families across New South Wales and Queensland.

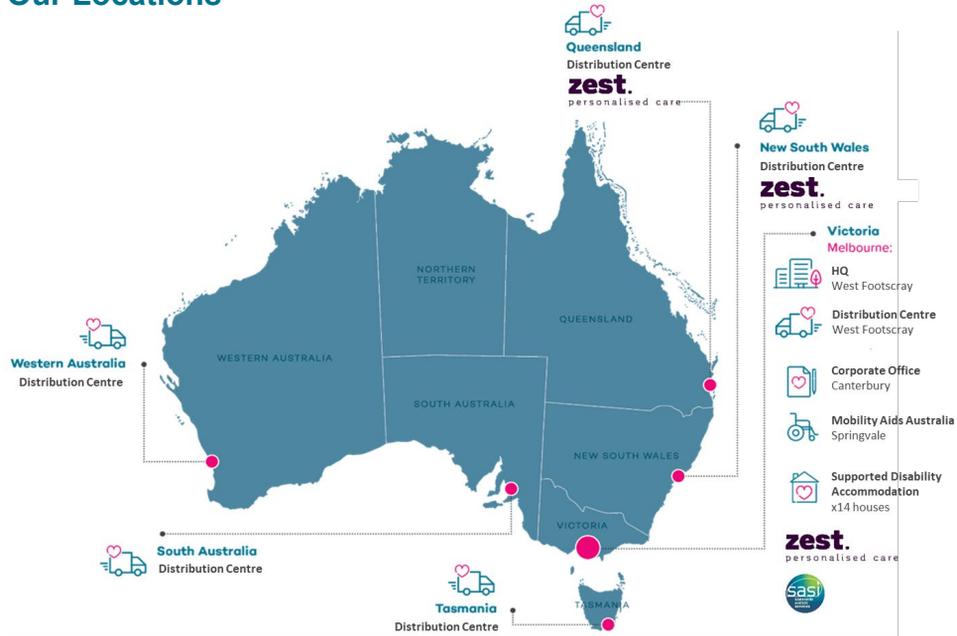
Statewide Autistic Services (SASI)

- In July 2023, IAG merged with SASI, a specialist provider of in-home and community supports, specialist disability accommodation and supported independent living options, positive behavior services, school leaver employment support, support coordination, and centre-based and community recreation programs for Victorian's with autism and other disabilities.

Independence Australia Social Enterprise (Products)

- National supplier of healthcare consumables including continence, wound care, skincare and nutrition products, medical and daily living aids, and personal and protective equipment
- Mobility Aids Australia, a Victorian supplier of mobility aids and assistive technology products

Our Locations



Our Supply Chains

We purchase goods and services from a broad range of manufacturers, suppliers and service providers. These include:

Products

- Our comprehensive catalogue of medical and healthcare consumables which includes continence, wound care, daily living aids, nutrition and skin care products
- A broad range mobility aids and assistive technology including scooters, wheelchairs, beds, seating, walking aids, bathroom/toilet aids, living aids, lifters and ramps
- Freight and courier services for deliveries to customers
- Supplies necessary for the operation of the businesses

Services

- Periodically uses agencies for staff backfill

Corporate

- Technology software, services, and support
- Property and facilities including utilities, telecommunication, cleaning, building, waste, fleet, and related services
- A broad range of corporate, advisory and specialist services

- Other services necessary for the operation of the business

Our supply chain is managed in compliance with our corporate governance framework and aligned with our delegations.

1.3 Risks of modern slavery practices in the operations and supply chains

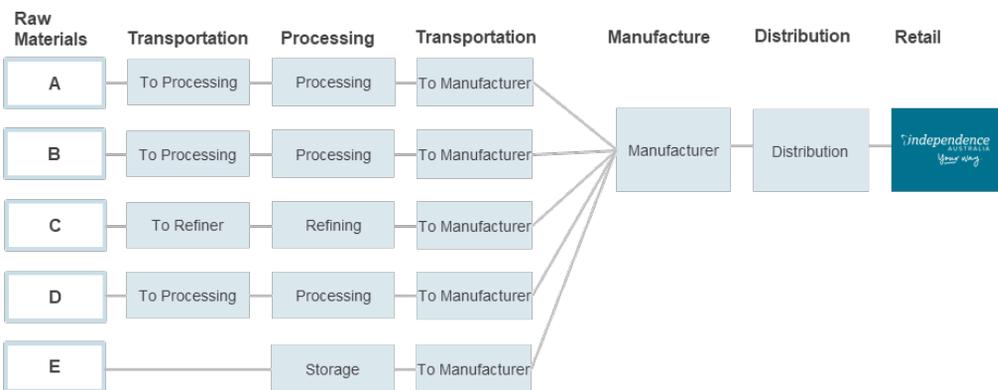
Operational Risks

Independence Australia is reliant on our suppliers for product information and its source. We adopt their policies and procedures to address modern slavery in our operations and supply chains. We work with our supply partners to respect and promote human rights.

Supply Chain Risks

The chart below details the generic process for sourcing our product range which includes continence pads, wound care, nutritional supplements, and various aids.

At any stage throughout the supply chain, risks may present for people to be subject to forms of modern slavery and exploitation.



Independence Australia Group is a reseller, not a manufacturer of products. As a result, we are inherently reliant on the information published and provided by manufacturers and our monitoring of the medical products sector.

The risks of modern slavery may be greater within some of our supply chain groups and operations due to the geographical location of some suppliers, our areas of operation, and the source of materials used in products supplied to us. In particular, certain materials sourced from South-East Asia have been identified as products whose production carries specific modern slavery risks. Our limited visibility in certain overseas markets carries additional modern slavery risks, particularly at the secondary levels of our chain of suppliers

(sourcing of raw materials) associated with the production of goods and services.

1.4 Actions taken to assess and address those risks

A number of measures have been developed to mitigate supply chain risks:

- Suppliers will continue to be advised that all forms of modern slavery are unacceptable to Independence Australia.
- We will continue to assess our supply chains to identify risks of modern slavery.

Other Measures:

- Policies and procedures: A modern slavery policy has been adopted.
- Safe reporting: All staff are encouraged to report modern slavery. Any reports are to be registered through our existing reporting process.
- Training: General awareness training is available to all staff through our Learning Management System (LMS). This training is mandatory for all staff involved with procurement and contract management.
- Regular review: Risk assessment processes and actions taken to address modern slavery are monitored and regularly reviewed.
- Other initiatives: We continue to evaluate initiatives from industry bodies, our auditor, key suppliers etc. to ensure that our approach remains contemporary and appropriate to the Independence Australia Group context.

Progress in 2023/24

- Additional suppliers have completed their iPro Modern Slavery Risk Assessment.
- All Staff involved with Procurement completed the new Modern Slavery Course.
- New and previously assessed suppliers completed the current iPro assessment .
- Engaged with Suppliers identified as having supply chains in high risk sectors to review their action plans as outlined in their iPro assessment.

Assessment completion rate

- 32 of our larger suppliers were invited to complete the iPro Modern Slavery Assessment.
- This is an increase of 11 additional Suppliers since 2023/24 assessment.
- 29 of these suppliers completed the assessment and comprise of 80% of our products/goods purchased in the year.

Supply Chain and Key Risks identified within Suppliers assessed

- High-risk sectors of operation: 55.2% of suppliers had operations in one or more of the sectors identified as ones of increased risk of forced labour exploitation.
- Production of Goods and/or Services in high-risk sectors: 34.5% of suppliers produced goods and/or services in one or more of the sectors identified as at increased risk of forced labour exploitation. This represents a reduction of 4.4% over the previous year at 38.9%.
- Sourcing goods and/or services in High-Risk Sectors: 65,5% of suppliers sourced goods and/or services from one or more of the sectors identified as at increased risk of forced labour exploitation. This represents a reduction of 6.7% over the previous year at 72,2%.
- Suppliers that complete the iPro Modern Slavery assessment are provided with a copy of the assessment and an action plan.

Our plans for 2025/26

- We will continue to roll out the iPro Modern Slavery Risk Assessment platform to further supplier categories.
- New and previously assessed suppliers will be required to take their initial and annual assessments.
- Suppliers identified as having supply chains in high-risk sectors will be engaged to review their action plans as outlined in their iPro assessments. This will inform us how they are reducing their modern slavery risks.
- Recent Acquisitions – We will review operations to include in the 2025/26 statement.

1.5 Assessing the effectiveness of modern slavery measures

Our modern slavery risk management strategy will be reviewed periodically to assess its effectiveness. Our risk assessment procedure requires annual review of all risks and controls, including modern slavery risks identified in our operations and supply chain.

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate risks of modern slavery in our operations and supply chain. For this reporting period we have undertaken the actions as described above.

- Engaged the senior management team
- Informed the wider organisation of Independence Australia's direction through targeted training and engagement.

1.6 Processes of consultation with entities owned or controlled

Independence Australia Group Ltd has one subsidiary company, Independence Solutions Ltd operating the Zest Personalised Care (Zest Care) business. The key personnel and Directors of Independence Solutions Ltd are subject to the policies and procedures of the parent entity, Independence Australia Group Ltd.

The Directors of Independence Solutions Ltd. were consulted in the development of this statement.

1.7 Any other relevant information

Nil.

Recommendation by the Board of Independence Australia Group Ltd.

This Modern Slavery Statement is unanimously endorsed and adopted by the Board of Directors and approved for submission to the Australian Government Attorney General's Modern Slavery Statement Register.

Signed,



Mr. Brian Meltzer

Chairman, Independence Australia Group Ltd.



Mr. Peter Turner

Managing Director & CEO, Independence Australia Group Ltd.

References

Legislation

- *Modern Slavery Act 2018* (Cth)
- *Modern Slavery Act 2018* (NSW)

Websites

- *Modern Slavery Register*

Guides

- *Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities – May 2023*



Independence Australia Group Ltd.

Building 1, 9 Ashley Street, West Footscray,
Victoria 3012

www.independenceaustralia.com.au