



# Neami Group Modern Slavery Statement FY23

December 2023



# Acknowledgments

Many thanks to everyone who contributed.



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## Introduction

Neami Group believes that freedom from slavery (in all its forms) is a fundamental human right and operates a zero-tolerance approach to any form of slavery in our operations and supply chains. This is Neami's third modern slavery statement.

The Neami Group Modern Slavery Statement has been drafted by Neami Limited (Neami) and its wholly owned subsidiary Mental Health and Wellbeing Australia Limited (Me Well), together 'Neami Group', to meet the mandatory reporting requirements for entities with a consolidated revenue of more than \$100m found in the *Modern Slavery Act 2018* (Cth) ('the Act').

This statement covers the reporting period from 1 July 2022 to 30 June 2023. It outlines the steps Neami has taken to identify, assess and manage the risk of modern slavery in Neami Group's operations and supply chains.

The Act outlines seven mandatory criteria to be covered by the statement, including:

- Identifying the reporting entity
- Describing the structure, operations and supply chain of the reporting entity
- Describing the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns/controls
- Describing the actions taken by the reporting entity and any entity the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes;
- Describing how the reporting entity assess the effectiveness of such actions; and
- Describing the process of consultation with any entities the reporting entity owns/controls;
- Providing any other relevant information

Modern Slavery describes situations where coercion, threats, or deception are used to exploit victims and undermine or deprive them of their freedom. The Act includes eight types of serious exploitation:

- Trafficking in persons;
- Slavery;
- Servitude;
- Forced marriage;
- Forced labour;
- Debt bondage;
- Deceptive recruiting for labour or services; and
- The worst forms of child labour (situations where children are subjected to slavery or similar practices or engaged in hazardous work).

# About Neami Group

*This section identifies the reporting entity and describes the structure, operations and supply chain of the reporting entity.*

## Overview

Neami National is a leading organisation in the mental health sector, with over 1,200 employees supporting people in over 49 different Indigenous lands across the nation. Neami's dedicated multi-disciplinary teams work in metropolitan, regional and rural communities, supporting over 38,000 people a year to achieve the wellbeing and mental health outcomes that matter to them. Neami also engages in evaluation, research and advocacy activities and supports student placements in various professions.

Neami has been providing mental health support for over 30 years. Neami is a values-based organisation which was founded on an alliance between professionals, individuals and their families. Neami walks alongside people to help improve their quality of life, on their terms.

Neami has developed strong relationships with various stakeholders, including government and non-government organisations, research institutions and suppliers.

## Neami Group Structure

Neami Limited trading as Neami National is a not-for-profit, unlisted public company, limited by guarantee. Neami Limited has a wholly owned subsidiary, Mental Health and Wellbeing Australia Limited, trading as Me Well. Both organisations are registered with the Australian Charities and Non-for-profits Commission (ACNC) and provide group reporting to the ACNC.

The Neami Group head office is located at 4-8 Water Road, Preston, Victoria.

Neami is governed by a [Board of Directors](#). The Board oversee the governance, compliance, review and risk assessment of Neami. The Board focus on the broader issues of organisational purpose and strategic positioning. Day-to-day operational management of the organisation is delegated to the [National Leadership Team](#), led by the Neami Group Chief Executive Officer, Tom Dalton.

Me Well is governed by a smaller Board of Directors which provides governance and strategic oversight. In June 2021, the Neami Group made the strategic decision to transition out of National Disability Insurance Scheme (NDIS) service provision and Me Well ceased operations in November 2021.

## Neami Group Operations

Neami Group provides community based mental health support services, housing and homelessness services, recovery-oriented clinical mental health support, suicide prevention and specialist community support. NDIS services were provided until the closure of Me Well. Neami Group's revenue is predominately derived from state and federal government funding.

As at 30 June 2023, Neami Group:

- Operated in Victoria, New South Wales, South Australia, Western Australia, the Northern Territory and Queensland.
- Employed more than 1200 employees.
- Supported more than 38,000 consumers.
- Had a consolidated revenue of \$148,143,221.

More information about Neami Group can be found here in our [2023 Annual Report](#).

## Neami Group Supply Chains

Neami Group manages approximately 1771 suppliers that provide goods and services to the organisation. Excluding staff, consumer and internal provider costs, Neami Group's creditor expenses for FY23 was \$44,533,972.

Suppliers include:

- Landlords and leasing agents
- Building fit-out and construction companies
- Consultants, including Auditors, Architects, Investment Advisers, Publicity and Communications
- Consortium partners
- Information Technology providers of assets and services
- Counselling Suppliers
- Temporary/contracted staff and Contractors
- Vehicle lessors
- Insurance companies
- Communications providers
- Cleaning services

Of the two highest spends, property leases (\$7.3m) relate only to Australian premises sourced through estate agents, and consortium partner costs (\$5.3m), which are payments to other Australian providers that co-deliver services with Neami Group.

Information technology expenses (\$4.2m) was the third highest supplier cost. Neami endeavours to contract with Australian companies in this space. However, most IT equipment is manufactured, and key IT providers, such as Amazon Web Services, are located overseas.

Companies directly linked to Neami supply chains, such as Lenovo and Amazon Web Services have modern slavery statements available for review. Their initiatives to reduce modern slavery are similar and include human rights principles or policies, codes of business conduct and ethics and supply chain standards.

Neami's investments are undertaken in consultation with their external investment advisors and in line with the Neami Investment and Ethical Investment Policies. Neami's investment advisors undertake ethical investment scanning and reporting on a monthly basis.



# Modern Slavery Risks

*This section describes the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns/controls.*

## Modern Slavery Risk Assessment

Neami Group has carried out a risk assessment process of modern slavery risks for FY23. This risk assessment process considered Neami's operations and supply chains and any potential links to modern slavery including the potential to cause, contribute to, or be directly linked to modern slavery.

Overall Neami assessed the risk of modern slavery practices occurring within Neami's operations and supply chain to be low.

## In Our Operations

Labour exploitation risks include vulnerable populations due to age, being migrant workers and low skilled workers, in addition to forced overtime.

The risk of Neami causing modern slavery practices in our directly employed workforce is very low. Most Neami workers are employed directly and the terms and conditions of their employment are managed by enterprise agreement or modern awards. This is in line with the highly regulated Australian labour market. Neami also acknowledges the presence of unions to represent workers and complies with occupational health and safety measures and legislation to protect workers.

Neami strives to be an employer of choice and works towards improving employment conditions on an ongoing basis. During the current reporting period, Neami has negotiated on a new enterprise agreement, launched an employee value proposition and developed a people strategy.

Neami has robust recruitment processes that promote fairness and include 'right to work' and qualification checks, and ensures all employees are above minimum working age, in line with relevant Australian employment legislation. Where recruitment agencies are engaged only reputable leading agencies are selected.

Neami's policies and procedures address bullying, harassment and discrimination, as well as working standards and work flexibility.

Neami does engage a number of workers through labour hire agencies (\$2.5m). Neami reviews labour hire contracts and is conscious of this issue and actively ensures payments are in line with Australian employment standards and legislation. Most staff engaged through labour hire agencies are professional medical staff including medical practitioners and nurses.

Cleaning contractors have also been identified by Neami as another area requiring conscious contracting to ensure ethical practices are upheld.



## In Our Supply Chain

Within the Neami supply chain, the risk of modern slavery practices would be linked to product categories and country of origin.

Based on the [2023 Global Slavery Index](#), the top products at risk of modern slavery imported into Australia are electronics such as laptops and mobile phones. Electronics are the highest value product at risk of forced labour imported into G20 countries (2023 Global Slavery Index). Electronics are generally imported into Australia from China and Malaysia (2023 Global Slavery Index).

Neami is most likely to be linked to modern slavery with the purchase of IT hardware items originating in Asia.

Neami procurement practices are considerate of modern slavery practices. Neami engages contractors and suppliers using fair contract terms and undertakes due diligence before appointing new suppliers.

Where possible, Neami reviews supplier modern slavery statements.

# Due Diligence and Remediation

*This section describes the actions taken by the reporting entity and any entity the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.*

## Operational and Supply Chain Due Diligence

Neami continues to monitor operations and supply chains to ensure Neami remains at a low risk of causing or contributing to modern slavery practices. Neami is developing a social impact strategy, and this includes scrutiny of procurement practices from a social impact and modern slavery lens.

Neami continues to operate in an industry with minimal interaction with key modern slavery product categories and/or high-risk countries. Neami periodically undertakes internal audits of its operations to ensure effective policies, practices and procedures are in place and that risks are mitigated. An internal audit of Neami's procurement practices was undertaken as part of Neami's FY23 Strategic Internal Audit Plan. No supply chain issues were identified.

## Grievances and Remediation Processes

Neami prides itself on protecting and respecting human rights across all operations and supply chains. This is reflected in Neami's Ethical Investment Policy, Diversity and Inclusion Framework, Advocacy Strategy, Social Impact Strategy and Reconciliation Action Plan.

Neami has a Whistleblower Policy to promote open communication throughout Neami Group, facilitate the development of ethical practices and safeguard the reputation, values and ethics of Neami Group. During the reporting period, Neami did not receive any notifications or reports under the Whistleblower Policy.

Where modern slavery risks are identified within Neami's operations or supply chains, Neami will:

- Engage with the relevant supplier to develop an appropriate resolution.
- Engage to support the relevant supplier to understand the issues of modern slavery risks.

## Effectiveness Measures

Neami believes strongly in continuous improvement. There is no end to the assessment of actions being taken to reduce and eradicate modern slavery.

As part of the effectiveness measures, aspects of modern slavery avoidance are noted on the Neami Group risk register under multiple risks, including 'partnering, outsourcing and contracting' and 'compliance'. Neami continues to mitigate risks to lower their ratings.

Prior to Neami's next modern slavery statement submission Neami plans to implement the following actions:

- Regular review of supply chain risks.
- Continue to engage with suppliers to understand their modern slavery risk mitigation strategies and review modern slavery statements for key risk suppliers.
- Continued and detailed consideration of Neami's current Investments and Ethical Investment Policy to proactively invest in ethical organisations in line with Neami's Social Impact Strategy.
- Review of the partnership framework and procurement procedures to ensure best practice.

## Consultation

Neami Group has shared corporate support functions. Neami Group also has Group policies and procedures. Engagement of suppliers and purchase of goods are centralised. This ensures consultation with both entities is open-ended.

# Governing Body Approval

This statement was approved by the Board of Neami Limited on 07 December 2023. The Board of Neami Limited also approved this statement on behalf of the second reporting entity and Neami Limited subsidiary, Mental Health and Wellbeing Australia Limited, on 07 December 2023.



Ruth Faulkner – Director and Board Chair of Neami Limited

07 December 2023

## More information

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We acknowledge Aboriginal and/or Torres Strait Islander peoples and communities as the Traditional Custodians of the land we work on and pay our respects to Elders past, present and emerging. We recognise that their sovereignty was never ceded.

Neami celebrates, values and includes people of all backgrounds, genders, sexualities, cultures, bodies and abilities.