



Modern Slavery Statement

2021/22



ABOUT

Campaign

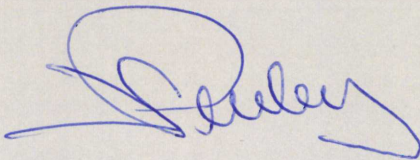
Modern Slavery Statement

Reporting period

30 June 2021 – 1 July 2022

This Modern Slavery Statement has been approved by the Minda Inc Board of Directors on 24 November 2022.

Signed



Joanne Denley

Board Chair

21/12/2022



The Australian Modern Slavery Legislation

The Australian Government passed the Modern Slavery Act 2018 (the Act) which came into force on 1 January 2019 establishing reporting requirements. Minda Incorporated (Minda) is a reporting entity under the Act and is required to prepare an annual statement to meet the seven mandatory criteria for the reporting period. Minda's reporting period is 1 July to 30 June.

Criteria 1 Our Reporting Entity

Minda is registered with the Australian Charities and Not-for-profits Commission (ACNC) with an approved reporting group incorporating the following wholly owned or Controlled Entities, known as the Minda Group:

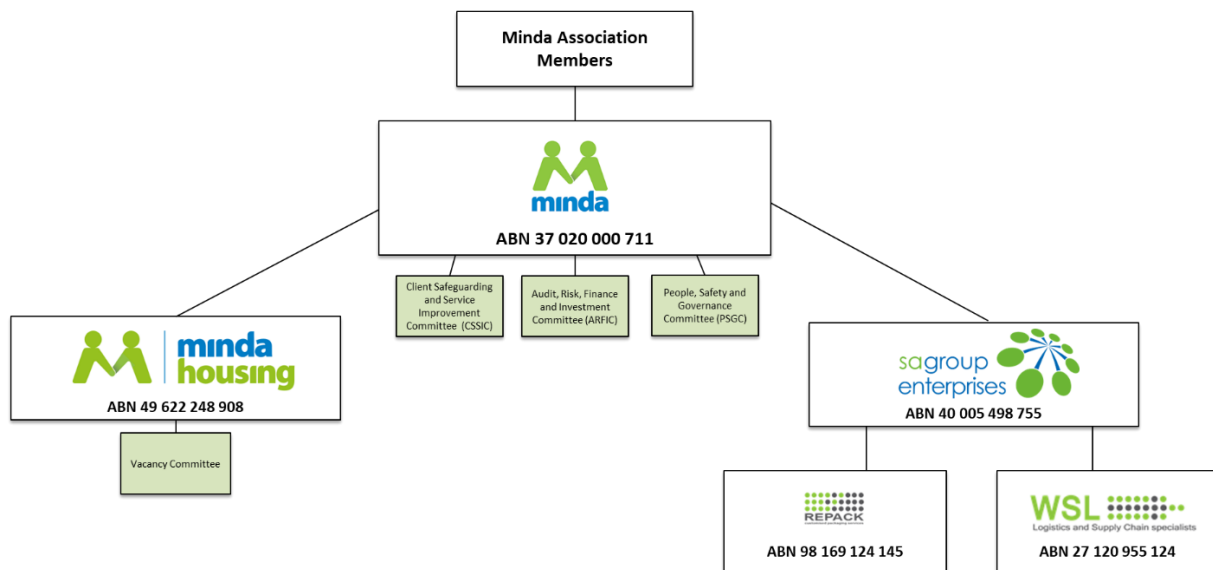
- 1) Minda Incorporated 37 020 000 711 (Minda Inc)
- 2) Minda Housing Ltd 49 622 248 908 (Minda Housing)
- 3) S.A. Group Enterprises (SAGE) Incorporated 40 005 498 775 and its subsidiaries:
 - a) Repack Pty Ltd 98 169 124 145
 - b) Wine Storage & Logistics Pty Ltd 27 120 955 124

Minda and SAGE are incorporated under the Associations Incorporation Act 1985 (SA), while Minda Housing is limited by guarantee under the Corporations Act 2001 (Cth) as are SAGEs subsidiaries.

Under the Associations Incorporation Act, the Minda Inc Board (the Board) is accountable to its Association members and other stakeholders, and is responsible for overseeing efficient, accountable, and effective management, governance, and strategic direction of the Minda Group business operations.

The boards of each Controlled Entity operate within the boundaries of the *Minda Group Governance Framework (Minda's Governance Framework)*. Each board provides oversight of the operations of the respective Controlled Entities. *Minda's Governance Framework* promotes meaningful and effective roles for the Controlled Entities' boards without compromising the overall Minda Group governance.

Minda Corporate Structure



The Board’s objective is to provide independent governance and ensure peak operations such as finances, acquisitions, residential standards, and corporate identity are performing to the highest level and meeting the needs of people supported by Minda.

Criteria 2 Our Structure and Governance

People living with an intellectual disability are at the heart of what Minda does and we strive to be flexible and adapt to changing expectations and what it is that they want from a service provider. Minda is committed to ensuring the organisation has a clear strategic direction and purpose founded on our core values.

The Minda Group is an approved reporting group with the ACNC with a focus on our values of **Respect, Heart, Opportunity** and **Community** which is supported by a workforce of 2,275 staff (including 317 supported employees) and 297 active volunteers. We provide accommodation, employment, lifestyle and development services and respite to South Australians with a disability.

RESPECT	HEART	OPPORTUNITY	COMMUNITY
<p><i>We respect the right of a person living with an intellectual disability to self-determination in living their best life.</i></p>	<p><i>We demonstrate care and love for those we support in all that we do.</i></p>	<p><i>We focus on the positive and what people can do rather than what they cannot do to create opportunities.</i></p>	<p><i>We recognise the importance of community to a person’s wellbeing and strive to create an inclusive community where people living with an intellectual disability are valued for themselves and the contribution they make to community.</i></p>

Our Policies and Procedures

We value and comply with all laws within corporate social responsibility, industrial disability standards, environmental obligation, workplace safety protection and regulation, and staff inclusion and diversity.

Our practice, policies and procedures have zero tolerance for violence, abuse, neglect, exploitation and discrimination of any form and the policies and procedures apply to all staff, contractors, temporary agency workers, students on placement and volunteers. The Board reviews and approves policies and frameworks, and substantiates itself with effective systems of compliance, risk management and internal control.

Minda recognises all people with a disability have human and legal rights which should always be respected. We promote and protect those rights as an integral component of our services.

In addition to *Minda’s Governance Framework*, we operate a *Policy Framework* that contributes to risk mitigation strategies for modern slavery in our operations and supply chain. These include our:

<i>Children’s Services Code of Conduct</i>	<ul style="list-style-type: none"> All employees and volunteers are responsible for promoting the safety and well-being of children and young people.
<i>Children’s Services Safeguarding and Compliance Procedure</i>	<ul style="list-style-type: none"> The Child Safeguarding Policy sets out standards for staff and partners regarding identifying and reporting child exploitation and abuse.
<i>Fraud Prevention and Management Policy</i>	<ul style="list-style-type: none"> Policy is to define fraud, the areas of potential concern, our fraud management process and our responsibilities when investigating a potentially fraudulent activity.

<i>Human Rights Policy</i>	<ul style="list-style-type: none"> Promotes human rights practice and embed into our decision making.
<i>Operational Governance & Accountability Framework</i>	<ul style="list-style-type: none"> Operationalises and further enhances the Boards Governance Manual that is applicable to the Minda Group. It enables Minda to deliver on its strategic objectives as outlined in Minda’s strategic plan.
<i>Policy, Compliance and Accreditation Framework</i>	<ul style="list-style-type: none"> Describes a framework for ensuring Minda meets its legislative and regulatory compliance obligations. It describes the procedures, registers and schedules which support and guide our compliance activities and the regulatory bodies to which we are accountable.
<i>Risk Management Framework</i>	<ul style="list-style-type: none"> Outlines how Minda approaches the management of risk to ensure we embed the principles of best practice risk management to mitigate our risks.
<i>Recruitment Policy</i>	<ul style="list-style-type: none"> Outlines Minda’s compliance to Federal Awards, National Employment Standards, Enterprise Agreements, and employer/supplier contracts.
<i>Whistle blowers Protection Policy</i>	<ul style="list-style-type: none"> Provide safeguarding measures where staff or suppliers might wish to voice concerns around modern slavery and safe workplace practices.
<i>Working with Integrity at Minda Our Code of Conduct:</i>	<ul style="list-style-type: none"> Outlines the minimum standards for how we conduct our individual and organisational practice, and is founded on ‘person centred thinking’, which is a human right- based approach to disability service and support. The code provides guidelines for expected attitudes and behaviour with consideration of the principles of ethical and respectful behaviour and is underpinned by the National Disability Insurance Scheme.

Criteria 3 Minda’s Operations and Supply Chain

Minda’s vision is to be a leading force for good within Australia in supporting people living with an intellectual disability in all aspects for their lives. Our mission is to provide advocacy, support and services to enable people living with an intellectual disability to live their best lives.

Minda is committed to upholding dignity for all people. Freedom from slavery is a fundamental human right. Persons living with disability are at the forefront of human and civil rights awareness in this area.

This right is supported by our objectives to:

- Make a significant and measurable improvement to society’s attitudes towards people living with an intellectual disability.
- Contribute to improving the quality of life for people living with an intellectual disability.
- Ensure people living with an intellectual disability to live independently in a place of their choice, have stronger friendships and relationships, and be better connected to their communities.
- Ensure our staff and services add value to the lives of people living with an intellectual disability whether it is to live independently, provide round-the-clock support, help someone join in with local activities or provide advice and information.
- Facilitate more people living with an intellectual disability to have jobs in mainstream employment, and for more employers to know that people living with an intellectual disability make good workers when supported properly
- Our manufacturing operations support these objectives by incorporating supported employment programs within:
 - Electronic Recycling services: dismantling, sorting and shipment of recyclable products.
 - Manufacturing and Packaging Services: Packaging, sorting, collation, and quality inspection, bespoke timber products manufacturer and metal fabrication.
 - Facilities Services: Professional commercial and personal laundering, food services, and cleaning services.



These programs are tightly bound by the Fair Work Act and their regulations, and the Supported Employment Services Award as applicable.

Minda's supply chain includes suppliers and contractors to deliver a range of products and services that are needed to operate on a day-to-day basis including but not limited to soft and hard facilities management, preventative and reactive maintenance, utilities, waste management, fleet operations, equipment and furniture for offices and supported programs.

Impacts of COVID-19

Minda recognises the ongoing impacts of COVID-19 in its supply chain operations and its potential impact to vulnerable workers. There are many variables that contribute to increased risk of vulnerable workers, that includes loss of income, fear of loss of income, misunderstanding of workplace rights and exploitation due to increased demands. Our policies continue to adapt to address the aforementioned risks through mitigating risk of exposure to modern slavery through social distancing and related safeguarding measures for those in our immediate and extended community.

Our Progress to Date

This is Minda's second statement, and we recognise that our main area of modern slavery risk comes from our external supply chains. Our direct suppliers are Australian based, which is viewed as a low-risk area for modern slavery. We commit to continue to comply with all laws governing workplace safety, corporate social responsibility, and employee inclusion and diversity.

We expect our suppliers and contractors to operate in accordance with all applicable modern slavery legislation – including other overarching universal Commonwealth legislations. The Board has established subcommittees to, among other activities, oversee and monitor the effective management of human rights-related risks, including modern slavery. The Chief Executive is accountable for the implementation of our human rights approach, supported by the Chief Financial Officer and other members of the Executive team as set down by *Minda's Governance Framework*.

Our standards for doing business are governed by our *Working with Integrity at Minda Our Code of Conduct* which applies to all employees, contractors, volunteers, and students who provide service, study, or participate at Minda. In addition, we have implemented a *Policy Modern Slavery Statement* to recognise within our framework the importance of the Act.

Criteria 4 Actions taken to assess and address these risks, including due diligence and remediation processes.

This statement outlines our commitment to prohibition of all forms of slavery, child or forced labour within our operations and the operations of our suppliers.

Due Diligence

Due diligence underpins our management of modern slavery risks and assists Minda to ensure compliance of our processes with the United Nations Guiding Principles on Business and Human Rights. This is an ongoing and iterative process of identification, prevention and mitigation of risks that considers both actual and potential adverse impacts on human rights through our activities and our business and enterprise.

The four key elements of human rights due diligence are:

- 1) Identification and assessment
- 2) Prevention and mitigation
- 3) Tracking and responses
- 4) Communicating how impacts are addressed

Minda will necessitate specific commitments to undertake ongoing 'Due Diligence' to identify, prevent and mitigate adverse impacts of modern slavery within our business operations and ensuring our policies and procedures meet our requirements and responsibilities to ethical business conduct.

Key Focus Areas

Minda will continue to have our key focus areas and take ownership and responsibility for compliance with the Act through our:

<p>ONGOING, ROBUST AND SYSTEMATIC REVIEWS</p>	<ul style="list-style-type: none"> Minda will conduct detailed risk analysis of our supply chain and contracts to identify areas of risk in relation to modern slavery, with an emphasis on human rights-based practice. Minda will also explore our current reporting mechanisms to increase our collation of quality data around our business practices
<p>REVIEW CONTRACTS AND SUPPLY CHAIN</p>	<ul style="list-style-type: none"> Minda will actively review our contract templates and procurement obligations to ensure that our suppliers and customers are aware of, and compliant with modern slavery legislation.
<p>UPDATES TO PROCESSES AND PROCUREMENT</p>	<ul style="list-style-type: none"> Update our supplier pre-qualification processes to request information and evidence of compliance to the Act and refine our procurement policies in alignment with the Act.
<p>FOSTERING AWARENESS AND TRAINING</p>	<ul style="list-style-type: none"> Create practice excellence training for Minda personnel to ensure those are familiar with the modern slavery legislation. Similarly, a consideration will be to develop modern slavery modules.

Identification of Risk and Assessment

We are committed to:

- 1) Completing the systematic review of our supply chain and assess the actual and potential risk and human rights impacts that may be caused by our actions.
- 2) To continue to mitigate impacts of modern slavery through continual assessment of our business operations and practice standards.
- 3) To cease the action of any business undertakings that contribute to the proliferation of modern slavery through ongoing and robust review of procurement and supply chain contracts.
- 4) Provide appropriate remedies to staff competency and awareness by developing easy-read modern slavery resources, and development of staff training.
- 5) Leveraging our understanding to mitigate risks of modern slavery and collaborating with our suppliers if an identified risk arises to rectify issues.

Minda remains dedicated to further strengthening its practices to continuously reduce any exposure to slavery within our business operations and our supply chain.

Criteria 5 Assessing Effectiveness

While Minda is not aware of any modern slavery practices within our supply chain, we have undertaken several coordinated actions to mitigate the potential risk of modern slavery in this reporting period including:

- Assessing the potential modern slavery risks in our operations and supply chains, with emphasis on high spend suppliers.
- Identifying the contracts that Minda has in place with its supply chain.
- Including Modern Slavery in its forward plan for internal audit processes.
- Reviewing effectiveness of due diligence practices.
- Identifying our policies that need updating to be inclusive of modern slavery in operations and supply chains.

Our Plan for the Future

In the next reporting period, Minda intends to progress the following deliverables against its key focus areas:

<p>ONGOING, ROBUST AND SYSTEMATIC REVIEWS</p>	<ul style="list-style-type: none"> ▪ Ongoing assessment of all new and existing suppliers and the associated risk within our supply chain, with a review on procurement and terms of engagement within our contracts. ▪ Issue a modern slavery questionnaire to our key suppliers.
<p>REVIEW CONTRACTS AND SUPPLY CHAIN</p>	<ul style="list-style-type: none"> ▪ Update all relevant contracts, policies and procedures related to the minimisation of risk and modern slavery. This is a pillar of continual improvement outlined in our operational governance policy. ▪ Update our contract templates to include terms that are consistent with the Act, with a particular emphasis at the procurement stage prior to engagement within our business operations.
<p>UPDATES TO PROCESSES AND PROCUREMENT</p>	<ul style="list-style-type: none"> ▪ Update our procurement processes to request information and evidence of compliance to the Act and refine our procurement policy in alignment with the Act.
<p>FOSTERING AWARENESS AND TRAINING</p>	<ul style="list-style-type: none"> ▪ Include modern slavery as an agenda item on our <i>People, Safety and Governance Committee</i> to assist the Board in its responsibilities in relation to governance, people, health and safety strategies, including client wellbeing, compliance obligations, performance and culture. ▪ Include modern slavery as a topic in induction training for Minda staff and volunteers to ensure they are familiar with modern slavery legislation.

Criteria 6 Process of consultation on the development of the statement

This Statement is made on behalf of the Minda Group and outlines our approach to prevent modern slavery within our supply chain. Under *Minda's Governance Framework*, the Board has the authority to approve this Statement for and on behalf of the Minda Group.

This Statement has been prepared in consultation with key team members from Governance, Procurement, Marketing, Human Resources, Training, Finance, Minda Housing and SAGE. Prior to submission to the Board for final review and approval, this Statement was endorsed by the Chief Executive, Chief Financial Officer, and its Executive Team.

This Modern Slavery Statement was approved by the Minda Inc Board at its November meeting and is signed by the Chair of the Board.