

**Independence Australia Group Ltd.**  
**Modern Slavery Statement**  
**2022/2023**

## 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 a supportive community.

We're a national business distributing products to hundreds of thousands of customers all over Australia. Funds generated from the sale of our product 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 the person's 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, integrity, respect, and quality. To demonstrate our commitment to these values, we adhere to the following guiding principles



### Customer Centric

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



### 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.

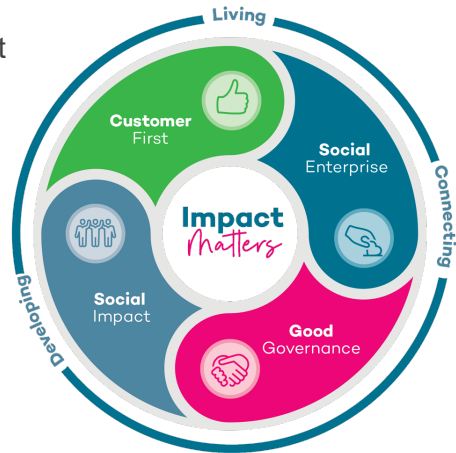


### Strive for Excellence

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

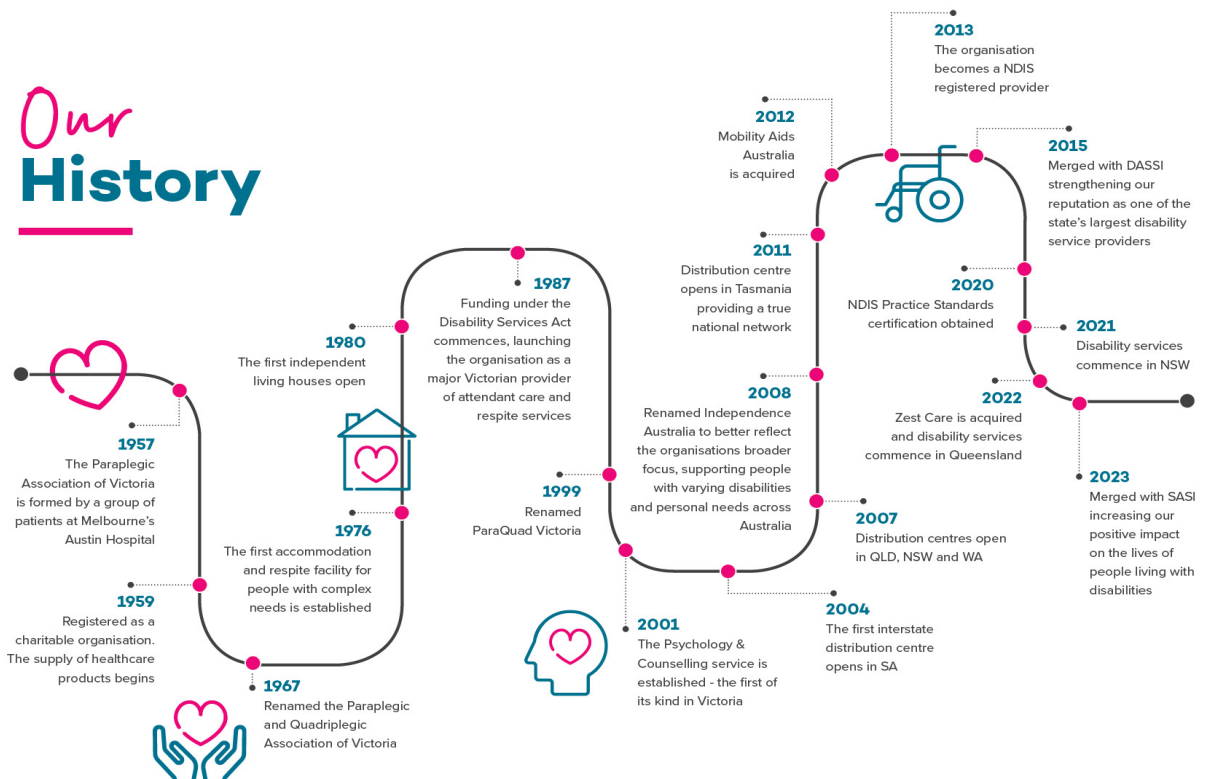
## Strategic Focus

- 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.”<sup>1</sup>*

We recognise 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 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).*

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<sup>1</sup> 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:

### Disability Services Victoria

- Statewide provider of in-home and community supports, shared supported accommodation, complex care and supported independent living options, support coordination, 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

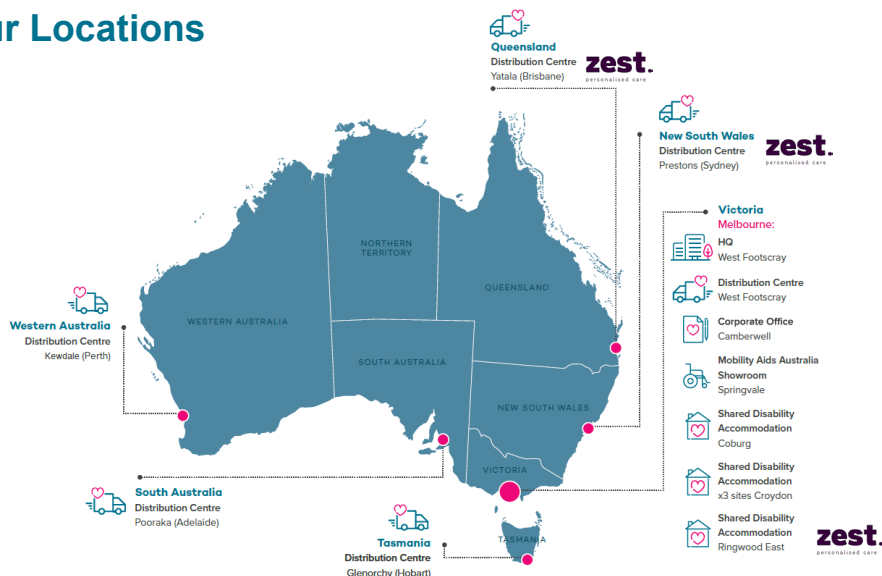
### Zest Personalised Care

- Australian South-East Coast provider of disability supports for people with a disability:
  - in-home & community supports (NSW & QLD)
  - support coordination (NSW)
  - plan management (NSW, QLD & VIC)
- New South Wales in-home supports, alternative care arrangements, supervised contact, respite, restoration and mentoring for vulnerable children, young people and their families

### Social Enterprise (Products)

- National supplier of medical and healthcare products including continence, wound care, daily living aids, nutrition and skin care
- Mobility Aids Australia, a leading 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 products that include continence, wound care, daily living aids, nutrition and skin care products
- A broad range Mobility Aids and assistive technology – scooters, wheelchairs, beds, seating, walking aids, bathroom/toilet aids, living aids, lifters & ramps
- Supplies necessary for the operation of the businesses

### *Services*

- Periodically uses agency staff for staff backfill
- Freight and courier services for deliveries to customers
- Technology software, services, and support
- Property
- 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**

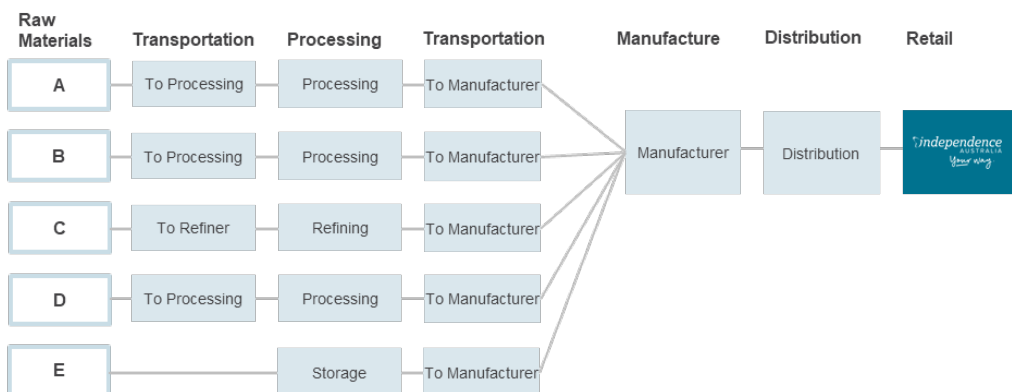
Independence Australia is reliant on our suppliers for product information and its source, we adopt their policies and procedures to address modern slavery in our operations and supply chains. We work with our supply partners to respect and promote human rights.

### **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 along the way, risks may present for people to be subject to forms of modern slavery and exploitation.



## 1.4 Actions taken to assess and address those risks

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

- All suppliers will be made aware that all forms of modern slavery are unacceptable to Independence Australia.
- We will assess our supply chains to identify risks of modern slavery.
- New suppliers are required to comply with our Supplier Code of Conduct.
- Non-compliance with our Supplier Code of Conduct will be regarded as a material breach of any agreement and deemed sufficient cause for terminating the agreement.

### Other Measures:

- Policies and procedures: A modern slavery policy has been adopted.
- Safe reporting: all staff are encouraged to report modern slavery. Any reports will be through our existing reporting process.
- Training: General awareness training is available to all staff through our Learning Management System. 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 (KPMG), key suppliers, etc. to ensure that our approach remains contemporary and appropriate to the Independence Australia Group context.

### **Progress in 2022/23**

- Purchased and commenced the roll-out of the iPro Modern Slavery Risk Assessment platform with a focus on our largest suppliers. Risk Assessments have commenced with our largest suppliers;
- Our staff have access to online modern slavery training. All Procurement are required to complete this training;
- We continue to support and participate in customer enquiries and assessments on modern slavery risks; and
- Actively monitor intelligence, industry/media reports, country of origin, type of product to inform our modern slavery risk assessments.

### **Our Plans for 2023/24**

- Assessment of large supplier modern slavery risk with further rollout of the iPro Modern Slavery Risk Assessment platform to other supplier categories;
- Finalise the review of our largest (high-volume) suppliers to have them describe how they can provide assurance in mitigating modern slavery risks in their supply chains; and
- Continue to actively monitor intelligence, industry/media reports, country of origin, type of product for conduct that is indicative of increased modern slavery risks.

## **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.

- Engage senior management team
- Inform wider organisation of Independence Australia's direction through targeted training and engagement.

## **1.5 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.

## **1.6 Any other relevant information**

Nil.

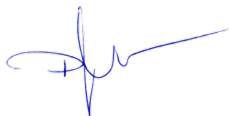
## **Recommendation by the Board of Independence Australia Group Ltd.**

This Modern Slavery Statement is unanimously endorsed and adopted by the Board of Directors and approved for submission to the Australian Border Force Online Register for Modern Slavery Statements.

Signed,



Mr. Brian Meltzer  
Chairman, Independence Australia Group Ltd.



Mr. Peter Turner  
Managing Director & CEO, Independence Australia Group Ltd.

## References

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### Legislation

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

### Websites

- Modern Slavery Register - <https://modernslaveryregister.gov.au/>

### Guides

- [Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities – May 2023](#) (ABF Business Engagement Unit)