

MODERN SLAVERY STATEMENT 2024-25



Reporting Period:

1 July 2024 – 30 June 2025

This Modern Slavery Statement has been approved by the Minda Incorporated Board of Directors.

Approved by:

Joanne Denley
Chair, Board of Directors

Date: 9/12/25

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About this Statement

This is Minda's fifth Modern Slavery Statement (Statement) under the Modern Slavery Act 2018 (Cth) and covers the 1 July 2024 to 30 June 2025 reporting period.

In responding to our reporting obligations under the Act, this Statement describes:

- Minda's structure, operations and supply chains
- our consultation processes with Minda's controlled entities
- potential for modern slavery risks across our operations and supply chains
- actions taken to assess and address risks of modern slavery across our operations and supply chains
- how we assess the effectiveness of our actions

1. Criteria 1 Our Reporting Entity

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

- Minda Incorporated 37 020 000 711 (Minda Inc)
- Minda Housing Ltd 49 622 248 908 (Minda Housing)
- S.A. Group Enterprises (SAGE) Incorporated 40 005 498 775

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)*. SAGE business ceased operations on 30 June 2024.

Under the *Associations Incorporation Act*, the Minda Inc Board (the Board) is accountable to the Association, its members and other stakeholders. The Association provides independent governance, ensuring that Minda operates to the highest standards while remaining focussed on the needs of the people we support.

The Board governs the Association and serves as the legal authority for the organisation. It is the overarching body that embodies Minda's vision: *to be a leader in the provision of supports to people living with an intellectual disability*.

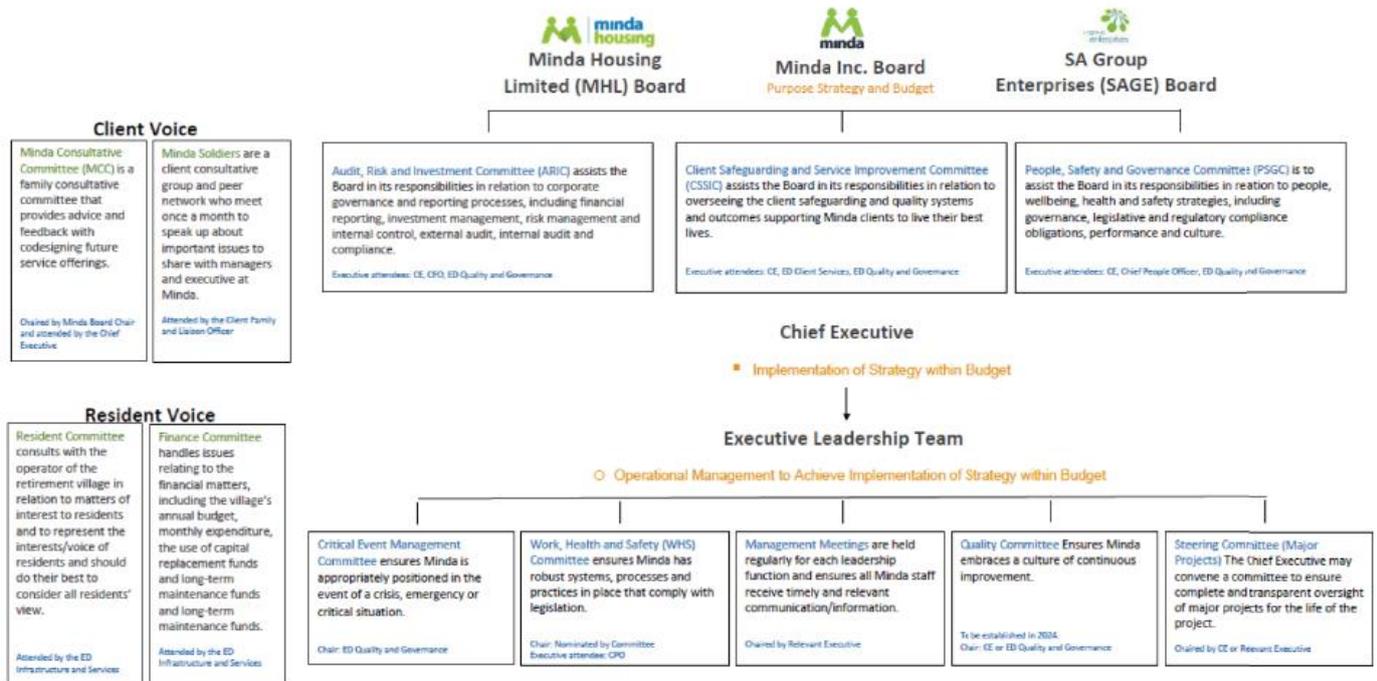
The boards of each Controlled Entity operate within the boundaries of the **Minda Group Governance Framework** (Minda's Governance Framework). Each board provides oversight of the operations of the respective Controlled Entities ensuring alignment with the Groups strategic direction and governance standards.

The Minda Group's approved reporting group with the ACNC reflects its commitment to fostering an inclusive community where the voice of people with intellectual disability is heard and acted upon.

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2. Criteria 2 Our Structure and Governance

MINDA GROUP GOVERNANCE STRUCTURE



Minda’s Governance Framework provides a clear statement of Minda’s commitment to good corporate and clinical governance outlining eight (8) principles to enhance the wellbeing of clients and employees, and ensures effective, accountable, transparent, and ethical management of resources:

- Principle 1 – Integrity and transparency
- Principle 2 – Client Centred Support, Dignity of Risk and Choice and Control
- Principle 3 – NDIS Practice Standards and Government Contractual Requirements
- Principle 4 – Advocacy, Diversity, and Inclusion
- Principle 5 – Wellbeing of skilled and qualified workforce
- Principle 6 – Stakeholders and partners
- Principle 7 – Continuous Improvement
- Principle 8 – Financial Management and Accountability

through Minda’s Service Excellence Plan ensuring that all employees are aware of the assumptions, principles and rules that form the basis of good governance.

After successfully delivering on our 2022-2025 Recovery Strategy ahead of target, Minda is now working towards its 2024-2027 ‘Stepping Forward Together’ Strategic Plan, which was launched in June 2024.

2.1 Our Policies and Procedures.

Minda through its Board and Chief Executive has a risk management strategy which is based on the principles and practices described within *ISO 31000:2018 Risk Management Guidelines*. All risk management activities conducted align with the Minda Risk Appetite Statement which is set by the Board of Directors and reviewed annually.

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In addition, Minda systematically evaluates its policy development and review processes to support an enhanced approach to corporate and clinical governance. The Minda’s Policy Governance Framework establishes the hierarchy and standard approach for policy documents including but not limited to policies, procedures and guidelines, to help the organisation promote consistency and quality in its activities and enhance operational efficiencies and reduce risk. The Board key policies include:

<i>Client Safeguarding Policy</i>	Provides guidance on how Minda promotes and protects the safety and wellbeing of its clients.
<i>Feedback and Complaints Policy</i>	Outlines the effective management of Minda’s feedback and complaints system ensuring it is transparent, accessible, inclusive, and responsive.
<i>Governance Policy</i>	Provides clarity, assurance and consistent oversight, accountability, and checks and balances to ensure Minda achieves its vision, mission and objectives and is sustainable for the long-term.
<i>Human Rights Policy</i>	Promotes human rights practice to embed in our decision making.
<i>Investment Policy</i>	Addresses the methods, procedures and practices which must be exercised to ensure the effective management of Minda’s financial assets.
<i>Risk Management Policy</i>	Determines Minda’s acceptable level of risk and ensures appropriate controls and mitigation strategies to contain the risk exposure within the level accepted.
<i>Whistleblower Policy</i>	Encourages the disclosure of wrongdoing to deter unlawful and unethical activity, promoting highest standards of conduct and ethical behaviour across all business activities.
<i>Worker Wellbeing Policy</i>	Outlines the commitment Minda has regarding the safety of workers in both the physical and psychosocial environment.

Minda prides itself on providing quality services to all clients and additionally complies with legislation and quality standards that exist for services delivered.

3. Criteria 3 Minda’s Operations and Supply Chain

3.1 Our Operations and Services

Minda is committed to a human rights approach to service planning and delivery. This approach upholds each person’s right to freedom of expression, self-determination and decision-making, balanced with our duty of care and respect for each individuals’ dignity and right to take risks. We are dedicated to upholding dignity for all people.

We provide supports to more than 1,000 clients living with disability through a broad range of services including home and living services, housing, children’s services, short term respite accommodation, supported employment, day programs and community support, allied health therapy and a Registered Training Organisation, known as SA Learning Centre (SALC).

Minda is aligned with the United Nations definition of capacity; “*Everyone including people with disabilities have the ability to make decisions for themselves unless it is proven otherwise*”.

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To ensure strong governance, the Board has established subcommittees to oversee and monitor key areas of governance including the management of human rights-related risks such as modern slavery.

- The *People, Safety and Governance Sub Committee* (PSGC). Supports the Board in matters relating to governance, people, health, and safety strategies, including client wellbeing, legislative and regulatory compliance obligations, performance and culture.
- *Client Safeguarding & Service Improvement Committee* (CSSIC). Oversees client safeguarding and quality systems to ensure Minda clients are supported to live their best lives.
- *Audit, Risk & Investment Committee* (ARIC). Provides oversight of corporate and financial reporting, investment management, risk management and internal control, external and internal audit, and compliance.

These subcommittees monitor the implementation actions outlined in Minda's Modern Slavery Statement. The PSGC has specific oversight of the *Minda Human Rights Board Policy* and *Minda Governance Board Policy*.

The Chief Executive is accountable for implementing our human rights approach, supported by the Chief Financial Officer and other members of the Executive team as outlined in *Minda's Governance Framework*.

3.2 Our Employment

Minda employs 1604 people, including 51 supported employees and engages 200 active volunteers who have contributed over 5,489 volunteer hours. A strategic consolidation and restructuring of business units, including the divestment of non-core business segments, such as SAGE has enabled Minda to focus on core services.

Our certified social enterprises provide meaningful work opportunities by identifying individual strengths and matching people to inclusive workplaces. Supported employment programs operate across:

- Facilities Services: food services, gardening, café and cleaning services.
- Supply Chain: store operations.
- People and Culture: Administration

These programs are tightly bound by the *Fair Work Act* and their regulations, and the *Supported Employment Services Award* ensuring compliance and protection for all employees.

3.3 Our Supply Chain

Minda's supply chain includes a select range of suppliers and contractors who provide essential products and services to support daily operations. These include facilities management, maintenance, utilities, waste management, fleet operations, equipment and furniture for offices and supported programs.

Most of our direct suppliers are based in Australia, which is generally considered low-risk area for modern slavery. Minda remains committed to complying with all relevant laws governing workplace safety, corporate social responsibility, and inclusion and diversity. We expect our suppliers and contractors to operate in accordance with all applicable modern slavery legislation as well as the broader Commonwealth legal obligations.

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3.4 Our Progress to Date

Minda recognises that our primary modern slavery risk arise from external supply chains and our direct and indirect workforce. Key actions taken across the organisation include:

- Ongoing evaluation of all new and existing suppliers as part of procurement processes
- Ensuring suppliers are predominantly Australian based, with services and supports delivered locally or interstate.
- Conducting due diligence for all new procurements in accordance with the Procurement Procedure, including checks relevant to modern slavery risks.
- Sourcing equipment and materials only from reputable Australian based companies or their Australian branches.
- Avoiding engagement with non-Australian-based suppliers, particularly in ICT and digital services, where enterprise architecture confirms all software providers operate through Australian entities.
- Prioritising social procurement principles, supporting ethical and inclusive sourcing practices.
- The Service Excellence Framework and Operational Governance Framework incorporated modern slavery awareness for staff and volunteers.
- Modern slavery is documented on Minda's enterprise risk register, this inclusion ensures visibility at the highest levels of governance and enables systematic monitoring, review, and mitigation planning.

4. 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.

4.1 Risk Management

Minda acknowledges that modern slavery can be present in vulnerable populations and higher risk industries and will therefore focus on these areas of its supply chains to identify any risks of modern slavery.

Taking into consideration whether Minda causes, contributes to, or is directly linked to modern slavery, the Minda Group through its Executives and Subcommittees

- considers that its operational activities do not directly result in modern slavery practices existing.
- does not consider it contributes to modern slavery, however, is aware that setting unrealistic financial goals and rapid timeframes for delivery can contribute to modern slavery risks.
- has implemented practices, and will continue, to examine whether there are any links to modern slavery practices through the activities of its suppliers and contractors and workforce.

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4.2 Due Diligence

Due diligence underpins Minda's approach to managing modern slavery risks and supports compliance with the *United Nations Guiding Principles on Business and Human Rights*. This is an ongoing and iterative process that involves identifying, preventing and mitigating risks and considers both actual and potential adverse human rights impacts across our operations and enterprise activities.

Minda is committed to undertaking ongoing due diligence to identify, prevent and mitigate the risks of modern slavery within our business operations and supply chain. This includes ensuring our policies and procedures reflect our responsibilities and support ethical business conduct.

4.3 Identification of Risk and Assessment

Minda recognises that modern slavery risks may arise through both direct and indirect business activities. We are committed to:

- Conducting strategic reviews to assess actual and potential human rights risks that may result from our actions or inactions.
- Continuously evaluating and improving our practices to mitigate impacts of modern slavery risks across all areas of operations.
- Enhancing staff awareness and competency through the development of easy-read modern slavery resources and targeted training programs.
- Collaborating with suppliers to address and rectify identified risks, leveraging our understanding to strengthen ethical practices across our supply chain and workforce practices.

Minda remains dedicated to continuously improving its approach to modern slavery risk management and reducing exposure across all aspects of our operations and supply chain.

5. Criteria 5 Assessing Effectiveness

While Minda is not currently aware of any instances of modern slavery within our supply chain, we acknowledge that potential risks remain. As part of our ongoing commitment to human rights, we continue to assess modern slavery risks across our workforce, operations, and supply chains.

During this reporting period we have updated key policies across human resources and risk management to reinforce our commitment to ceasing any business activities that may contribute to the perpetuation of modern slavery.

5.1 Our Plan for the Future

To strengthen our approach and ensure continuous improvement, Minda intends to progress the following initiatives:

- Ensure that non-procurement activities include assessment of third-party risks associated with modern slavery.
- Expand Minda's employee onboarding induction program to greater explain Modern Slavery.

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- Reviewing alignment with global standards in human rights, labour, environment and anti-corruption to foster a culture of integrity across our strategies, processes, supply chains, and partnerships.
- Introduce a Supplier Code of Conduct outlining minimum expectations for ethical conduct by suppliers and contractors of goods and services.
- Strengthen the Contract Management Policy and Framework to embed proactive measures for identifying, assessing, and mitigating modern slavery risks in the contract management phase of engagements.
- Maintain modern slavery as a strategic risk within our enterprise risk register, ensuring it remains a key focus in governance and decision making.

6. 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 operations and supply chain. Under *Minda's Governance Framework*, the Board holds the authority to approve this Statement for and on behalf of the Minda Group.

This Statement has been prepared in consultation with senior managers from across the Minda Group and endorsed by the Executive Team prior to submission to the Board for final review and approval.

Minda's Modern Slavery Statement was approved by the Minda Inc Board at its 26 November 2025 meeting and is signed by the Chair of the Board.

