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Modern Slavery
Statement

For reporting period 2020/21



Upholding dignity for all people.

About

Campaign:
Dates:

Modern Slavery Statement
Reporting period 2020/21

This Modern Slavery Statement has been approved by the Minda Inc Board of Directors on Monday 30th May 2022.

Signed

Dr David Panter
Chief Executive - Minda

Mission Statement, Values & Strategic Goals

Minda (Minda Incorporated & its associated entities, Minda Housing Limited [MHL] and S.A Group Enterprises Incorporated [SAGE]) exist to inspire purpose, potential and create community for those living with disability. Our people are at the centre of our thoughts, actions, and intent within our services. Minda works to be the difference in the lives of the people we support. We believe everyone should have the chance to meet their goals and lead fulfilling lives within the community.

Our vision is to be the world leader in cognitive disability care, services, and housing. Our mission is to facilitate lifetime care and service for South Australians living with disability. We support persons with disability across all age cohorts; young people, adults, families and the elderly. Our intent is to advocate for positive social change in the community by delivering services that empower and support our clients to lead fulfilling, meaningful lives.

Our Values:

Heart, opportunity, respect, community and empathy are our organisational values that drive our service provision.

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 Statement made on behalf of Minda outlines our approach to prevent modern slavery within our supply chain, as informed by the Modern Slavery Act 2018 (Cth) (Act), with an intent to review annually. 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. We implement our policies, and procedures in accordance with the Corporation Acts 2001 (Cth), National Disability Insurance Scheme Act (2013) and Universal Human Rights Based policies.

In assessing Minda's requirement for modern slavery statement, we take ownership and responsibility for compliance with the Act through:

1. Assessing the potential modern slavery risks in our operations and supply chains, with emphasis on high-risk suppliers and business transactions – with the consideration of how the COVID-19 pandemic has impacted our operations.
2. Developing and reviewing our policies on modern slavery in operations and supply chains.
3. Developing training for staff in modern slavery requirements.
4. Prepare to conduct 'due diligence' as listed below on local and global supply chains, with consumer safe and ethical practices.
5. Review supplier contracts to ensure they contain terms that are consistent with the Act, with a particular emphasis on procurement and terms of engagement within our business operations.

Minda recognises that:

- Everyone should have the opportunity to reach their potential;
- Everyone has the right to participate and contribute;
- Everyone should have an opportunity to lead purposeful and enriched lives.

Minda are committed to leading change, with empathy and understanding, respectful of the past and hopeful for the future.

Minda continue to maintain awareness of the United Nations 'Sustainable Development Goals' (SDGS) whereby the United Nations have committed to 17 tangible goals that "envision a future fully inclusive of persons living with disability" by 2030 (<https://www.un.org>). Minda's vision is to continue to foster a community, and in large part impact broader society, to support and empower those living with disability is to engage in meaningful civic participation and foster that platform to lead fulfilling lives.

One of the key pillars of how modern slavery awareness and advocacy will continue to enrich the Minda community will be related to our emphasis of 'customer connection', where we will direct robust attention to aspects co-design, collaboration and meaningful consultation and the forefront of our service delivery.

Our Business, Supply Chain and People

Minda recognises that modern slavery is an ongoing problem globally and nationally. It is estimated that 40.6 million people are subject to extreme forms of slavery world-wide. Within Australia, an estimated 1,900* people are subject to conditions that constitute modern slavery – demographics at risk are migrants, and in some contexts, persons living with disability, and in supported employment (<https://antislavery.org.au/modern-slavery/>).

Our Business:

Minda Incorporated (ABN: 37 020 000 711) was established in 1898 and was the first facility in the state providing residential support and education for those living with intellectual disability. Minda now is a multi-faceted group providing disability support, specialist support coordination, accommodation and employment services. Minda was the first non-government organisation in Australia to adopt the guiding principles of the United Nations Convention on the Rights of Persons with Disabilities (2007).

The Minda Group comprises*:

- Minda Incorporated 37 020 000 711
- Minda Housing Ltd 49 622 248 908
- S.A. Group Enterprises Incorporated 40 005 498 775
- Repack Pty Ltd 98 169 124 145
- Wine Storage & Logistics Pty Ltd 27 120 955 124

Our Structure & People

Minda Incorporated is a non-for-profit incorporated association under the Associations Incorporation Act 1985 (SA), and is governed by a Board. Under the Incorporated Associations Act, 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 Minda's business operations.

At Minda, we are committed to operating our business lawfully, ethically, and transparently, in that we prioritise relationships with suppliers that are aligned with our values and industry standards. Our practice, policies and procedures are in line for zero tolerance for violence, abuse, neglect, exploitation and discrimination of any form. We expect our suppliers to operate in accordance with all applicable modern slavery legislation – including other overarching universal Commonwealth legislations. The Board reviews and approves policies and frameworks, and substantiates itself with effective systems of compliance, risk management and internal control.

Governance includes:

- Ensuring the organisation complies with all aspects of legislation
- Monitoring the risk environment to ensure major risks are identified and managed
- Ensuring that corporate governance principles and policies are established and maintained

Our standards and practices are governed on conceptual principles legislated by the NDIS. Our Code of Conduct outlines the minimum standards for how we conduct our individual and organisational practice, and is founded on 'person centred thinking', which is a human rights-based approach to disability service & support. Our 'Governance & Operational Management' policy is predicated on numerous national and international legislative requirements which coordinates Minda's compliance to Federal Awards, National Employment Standards, Enterprise Agreements and Employer/Supplier contracts. These policies and procedures establish the foundation for standards of personal and corporate conduct across all services, with application to employees, volunteers, contractors, tradespeople, students and employees of Minda Incorporated and its associated entities.

* Minda Community Housing Incorporated ABN 65 079 135 394 awaiting deregistration.

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. This review will necessitate specific commitments to undertake ongoing 'Due Diligence' to identify, prevent and mitigate adverse impacts of modern slavery within our business operations.

Our Supply Chain

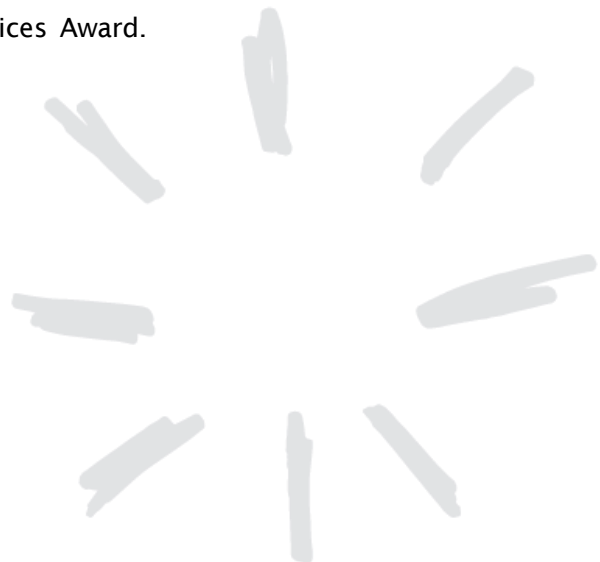
Our 'supply chain' includes the purchase of products and services that are needed for day-to-day operations including office supplies, furniture, facilities maintenance, IT infrastructure and goods for supported independent living and employment services. The Board has established subcommittees to, among 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. The day-to-day implementation and coordination of procurement and supply is the responsibility of Contracting and Procurement, who manage all procurement processes including supplier due diligence, contracts and engagement. This is an ongoing and iterative process that we commit to developing.

Minda is involved in the following manufacturing operations through its supported employment program through SAGE:

- Recycling services: dismantling, sorting and shipment of recyclable products
- Manufacturing & 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

Minda's procurement activities take place in Australia and our suppliers are predominantly Australia-based. Business operations at SAGE are tightly bound by the Fair Work Act and their regulations, and the Supported Employment Services Award.



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:

- Identification and assessment
- Prevention and mitigation
- Tracking and responses
- Communicating how impacts are addressed

Impacts of Covid-19

COVID-19 significantly disrupted the modern world as we knew it – and continues to significantly disrupt global supply chains across all industries, increasing the risk and vulnerability of workers to modern slavery, even within Australia. Supply-chain stressors like increased demands and factory-shutdowns and COVID-19 safety measures have disproportionately affected some workers and increased exposure to modern slavery. 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.

In considering these risks, Minda developed policies:

- COVID-19 Emergency Response Plan
- COVID-19 Outbreak Plans

These policies outline Minda's approach to address the aforementioned risks through mitigating risk of exposure to modern slavery through social distancing, providing full PPE to workers and other related safeguarding measures for those in our immediate and extended community.



Identification of Risk and Assessment

Minda is committed to continually improving our policies and procedures to ensure we source from suppliers who meet our pre-qualification requirements – this upholds our responsibilities to ethical business conduct. We are committed to completing a review of our supply chain and assess the actual and potential risk and human rights impacts that may be caused by our actions.

In assessing and identifying the actual and potential human rights impacts that may've been caused by our actions of the supply chain, our risk response will be:

- To continue to mitigate impacts of modern slavery through continual assessment of our business operations and practice standards
- 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
- Provide appropriate remedies to staff competency and awareness by developing easy-read modern slavery resources, and development of staff training
- Use leverage of our understanding to mitigate risks of modern slavery
- Collaborating with a supplier if an identified risk arises to rectify issues.

Key Areas of Action

The key areas of action for Minda Group moving forward will be:

Ongoing, robust and systematic reviews

Minda will conduct detailed risk analysis of our supply chain and procurement 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.

Review supply contracts and supply chain

Minda will actively review supply contract templates and procurement obligations to ensure that our suppliers and customers are aware of, and compliant with, Australia's modern slavery legislation.

Updates to processes & procurement

Update our supplier pre-qualification processes to request information and evidence of compliance to the Modern Slavery Act, and refine our procurement policies in alignment with Modern Slavery Act.

Fostering awareness and training

Create practice excellence training for Minda personnel to ensure those are familiar with the modern slavery legislation. Minda will also continue to foster awareness within the Minda community, and provide safeguarding measures who might wish speak to concerns around modern slavery and safe workplace practices. Similarly, a consideration will be to develop modern slavery modules.

Assessing Effectiveness

To ensure that Minda are effective, we further commit to:

- Periodic communication with suppliers who provide services, and avail services, that are in a high-risk setting in relation to modern slavery
- Non-compliance is reported to senior management with remediation steps applied, including termination of supply with immediate effect when appropriate
- Ongoing engagement and consultation with stakeholders to prevent, slavery, exploitation or financial abuse within our supply chain.

Recommendations

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

Our key focus areas are:

- Ongoing assessment of all new and existing suppliers and consumers and the associated risk within our supply chain, with a review on procurement and terms of engagement within our contracts
- Minda will work to 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.

Continue to progress supplier pre-qualification screening, which will include incorporating a risk categorisation of modern slavery and terms of re-negotiation for high-risk suppliers.

