

PeopleKind Group

We're for people

**PeopleKind Group
Modern Slavery Statement
Financial Year Ended 30 June 2025**

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Foreword

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. It can occur in many forms including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage and any forms of child labour.

The introduction of the Modern Slavery Act 2018 aims to combat modern slavery in global supply chains.

PeopleKind Group (PEOPLEKIND GROUP), ABN: 11 652 673 553, is a Company Limited by Guarantee and is registered as a charity with the Australian Charities and Not-for-profits Commission. PEOPLEKIND GROUP is committed to ensuring that the risks of modern slavery in our business operations and supply chains are managed and minimised.

We are pleased to submit our statement on modern slavery for the financial year ended 30 June 2025. It is an expression of our commitment as a socially responsible organisation, and a reflection of PeopleKind Group's Vision, Purpose and Values, details of which follow.

Vision: To build a community where everyone belongs and feels connected;

Purpose: To empower people to live their best life; and

Values (we are)

Compassionate: We listen with our hearts and minds, understanding that everyone has their own journey.

Respectful: We respect ourselves, our colleagues, and the people we support. We are open to new ways.

Collaborative: We understand we're all in this together. We work together with a 'can do' attitude to achieve mutual goals.

Resilient: We bring our best self to work, recovering quickly when things change.

Courageous: We have the courage and integrity to do what's right, even when it is hard.

PEOPLEKIND GROUP is a reporting entity under the *Modern Slavery Act (2018)* and this Modern Slavery Statement covers the reporting period 1 July 2024 to 30 June 2025.

The Statement outlines the approach PEOPLEKIND GROUP has taken to identify, assess and manage modern slavery risks in our operations and supply chain.

This statement was approved by the Board of PeopleKind Group on 26 November 2025.


Evelyn Hogg (Nov 27, 2025 19:18:57 GMT+8)

Evelyn Hogg
Chairperson

Mandatory Criterion 1: Identify the Reporting Entity - PeopleKind Group (PEOPLEKIND GROUP)

PEOPLEKIND GROUP is a Public Benevolent Institution (PBI) with Deductible Gift Recipient (DGR) status and has provided innovative and people-focused services to the communities we serve for over 70 years, largely through Nulsen Disability Services.

PeopleKind Group is one of Western Australia's largest human service providers. The services delivered through our various organisations encompass disability services, child protection, young people support, allied health, housing, justice, reintegration, mental health and training.

PeopleKind Group incorporates the following wholly owned or Controlled Entities, collectively known as the PeopleKind Group:

- (1) PeopleKind Group Ltd ABN: 11 652 673 553
 - a. Melior Positive Behaviour Support (trading name)
 - b. Outcare (trading name)
 - c. Superyou Therapy (trading name)

- (2) Kids' Camps Ltd ABN: 61 107 589 574
 - a. Cahoots Org (trading name)
 - b. Cahoots WA (trading name)
 - c. Cahoots Adventure Camp (trading name)

- (3) Liift Learning ABN: 65 670 810 036

- (4) Nesti Housing Realty Pty Ltd ABN: 17 664 553 477

- (5) Nesti Community Housing Ltd ABN: 64 625 479 709

- (6) Nulsen Group Ltd ABN: 43 130 353 890

- (7) Lady Lawley Foundation Ltd ABN: 91 656 254 901 **[inoperative]**

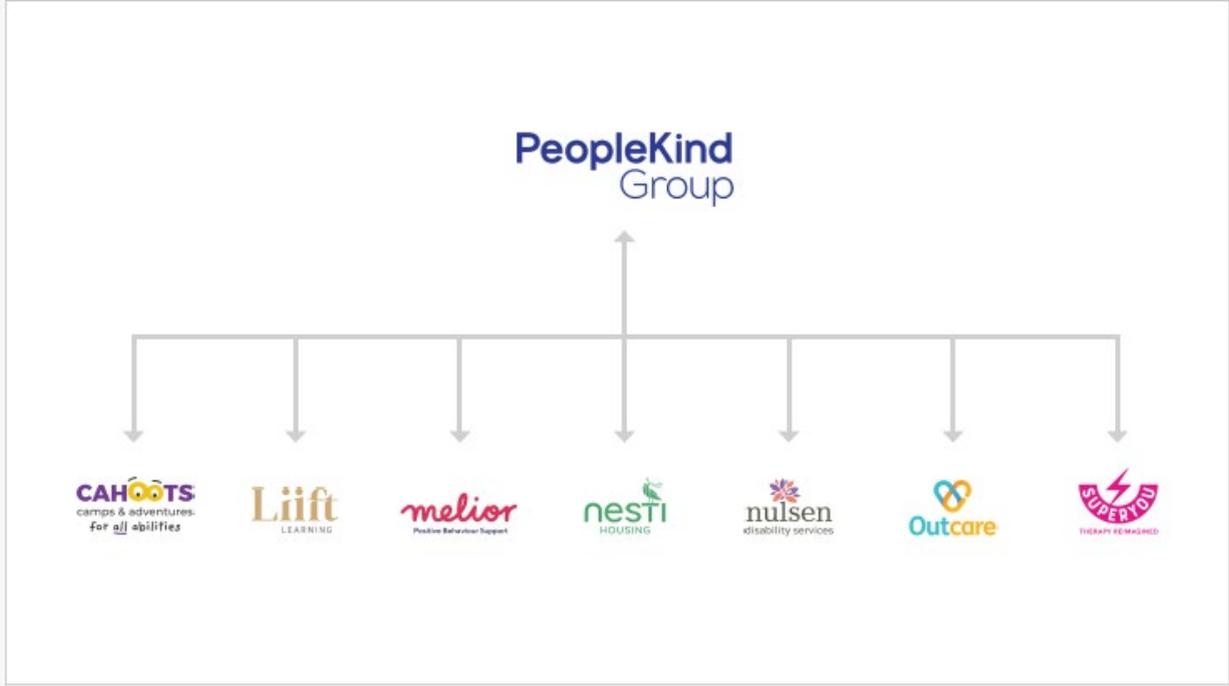
- (8) Portle Pty Ltd ABN: 38 666 956 485 **[inoperative]**

As a Company Limited by Guarantee, PEOPLEKIND GROUP is governed by a Board of Directors. PeopleKind Group's independent Board is responsible for overseeing the governance, strategic direction and the efficient, accountable and effective management of the PeopleKind Group's business operations. The Company is managed by a Group CEO who is supported by an Executive Team.

The Boards of each Controlled Entity (Nesti Housing Realty Pty Ltd, Nesti Community Housing Ltd, Nulsen Group Ltd) provide oversight of the operations of the respective Controlled Entities while operating within the boundaries of the PeopleKind Group Governance Framework.

Mandatory Criterion 2: Describe PeopleKind Group's structure, operations and supply chains

Structure



The antecedents of the PeopleKind Group go back over 70 years with the formation of what was then designated as the Mentally Incurable Children’s Association. That organisation evolved into Nulsen Haven and, in turn, Nulsen Disability Services. With the advent of the National Disability Insurance Scheme, it was deemed prudent to diversify into PeopleKind Group and provide a range of complementary services to the human services sector. A brief summary of the services provided is outlined below.

- Cahoots** helping young Western Australians live their best lives with a variety of inclusive Services.
- Liift Learning** empowering individuals and organisations by delivering excellence in diverse and innovative training solutions.
- Melior** creating strategies for life through Positive Behaviour Support.
- Nesti Housing** bringing opportunities home through Specialist Disability Accommodation (SDA), social housing and property management services.
- Nulsen** empowering people with complex disability to live their best life.
- Outcare** providing justice, reintegration and support services to help people engage positively with the community.
- Superyou** providing therapy and allied health services for people with disability.

Operations

PeopleKind Group operates, in large part, in the greater Perth metropolitan area but does provide some services in Albany, Bunbury and Kalgoorlie. PeopleKind Group currently has no operations outside of Western Australia.

As at 30 June 2025 PeopleKind Group employed 1,134 personnel and supported 7,067 clients. Our strategic focus during the year in question was to strengthen our financial position while continuing to empower the people we support to live their best lives and reduce disadvantage

within our community.

Supply Chains

As a human services organisation, the bulk of PeopleKind Group's expenditure is associated with employee costs. PeopleKind Group undertakes most of the procurement for the Group and endeavors to use local suppliers where possible with a view to supporting local businesses and creating long-term relationships.

The Types of goods and services we obtain and use include the following.

- Medical consumables
- Equipment/machinery
- Fleet services
- Facilities Management
- Real estate
- Construction services
- Textile-related goods
- Utilities
- Allied Health Services
- Agency contracts/staff
- ICT hardware and software
- Travel services
- Office supplies

Mandatory Criterion 3: Describe the risks in PeopleKind Group's operations and supply chains

As a human services provider operating in a number of highly regulated sectors, PeopleKind Group considers the risk of Modern Slavery within its direct operations to be low.

PeopleKind does, however, recognise that through its supply chains as detailed under Mandatory Criterion 2, it may be indirectly exposed to the risk of modern slavery and human trafficking, and it acknowledges there can be limitations in its practical ability to scrutinise the supply chains of parties that supply the Group with such goods and services.

Nevertheless, it is recognised that increasing scrutiny of the suppliers comprising our supply chain is warranted and continues to have our ongoing attention going forward.

Mandatory Criterion 4: Describe the actions taken by PEOPLEKIND GROUP to address the risks, including due diligence and remediation

Given that PeopleKind Group and its wholly owned or Controlled Entities provide services to the human services sector, the bulk of our expenditure is related to employee salaries and related costs. Therefore, the expenditure of only two of our suppliers exceeded \$1 million. For the financial year in question, we expanded the range of suppliers to whom we submitted questionnaires. For the 2024 financial year, we identified 24 suppliers whose level of expenditure exceeded \$100K. For the 2025 financial year, we identified 35 suppliers whose level of expenditure exceeded \$75K.

For the current reporting year, we increased the number of questions posed from 8 to 11 and introduced a form of Likert scale into some of the questions posed. The revised questionnaire was submitted to the 35 identified key suppliers and 23 responses were returned.

A concise summary of the **23** supplier responses received on the questions posed follows.

- Number who are required to submit a Modern Slavery Statement - **0**
- Number who have a Modern Slavery Policy in place - **8**
- Number who are aware of the existence of Modern Slavery within their organisation - **0**
- Number who train their employees on Modern Slavery matters - **9**
- Number who perform screening of prospective suppliers - **10**
- Number who are aware of the existence of any Modern Slavery within their supply chains - **0**
- Number who would respond to allegations of Modern Slavery within their supply chains - **21**
- Number who employ due diligence activities to endeavour to identify, prevent and mitigate Modern Slavery risks within their supply chains – **6**
- Number who source supplies from countries known to have a high risk of labour exploitation – **2** [countries mentioned included the following, with their respective Walk Free Global Slavery 2023 Index Rating noted in brackets – China (4.0), Vietnam (4.1), India (8.0), Malaysia (6.3), Indonesia (6.7) and Thailand (5.7). For comparison, Australia's Global Slavery Index is 1.6
- Number who were aware of modern slavery complaints being made in their organisation - **0**
- Number who have implemented changes regarding modern slavery risk management during the past year - **4**

The size and type of activity of most of the 23 respondents would explain the mixed response we received to our questionnaire. However, there were indications this year of a heightened awareness of the issue of Modern Slavery, which was encouraging.

No Modern Slavery risks were identified in those responses that would warrant the PeopleKind Group undertaking corrective mitigation steps, although we acknowledge that a more robust form of analysis is warranted in the future.

From a Due Diligence and Governance perspective, the PeopleKind Group Board oversees a range of key policies that are applied across the Group. Those policies are reviewed every three years, or more frequently if circumstances warrant. They include the following.

- Code of Conduct
- Diversity, Equity and Inclusion
- Feedback and Complaints
- Modern Slavery and Ethical Sourcing
- Whistle-blower

Additionally, we are currently in the process of appointing an Internal Auditor whose role will include an increasingly critical focus on the Group's supply chain.

Mandatory Criterion 5: Describe how PEOPLEKIND GROUP assesses the effectiveness of any remediation processes undertaken

To date, we have yet to identify any issues of concern relating to our suppliers. Therefore, no remediation processes have been undertaken at this point in time.

That said, while we consider our exposure to Modern Slavery risks is low, we will be looking to enhance the monitoring, evaluation and reporting mechanisms in the future to reinforce our commitment to ongoing continuous improvement.

Mandatory Criterion 6: Describe the process of consultation with any entities owned or controlled by PEOPLEKIND GROUP

While PeopleKind Group undertakes the bulk of the procurement on behalf of the Group, certain organisations within the Group do need to source specialised products and services. In fact, of the 23 suppliers who responded to our questionnaire, 9 came from suppliers to our subsidiary organisations.

Mandatory Criterion 7: Provide any other relevant information

Since the submission of our 2024 Modern Slavery Statement, we have undertaken, or are looking to undertake, the following initiatives.

- Incorporate the topic of Modern Slavery within our Induction and Training Programs, stressing that we support open and safe communication within the Group
- Review and update our Modern Slavery and Ethical Sourcing Policy
- Undertake ad hoc Internal Audits of our suppliers of medical consumables, vehicles, textiles, ICT equipment and office supplies that emanate from countries with high Global Slavery Indices
- Undertake appropriate due diligence when evaluating potential new suppliers

Modern Slavery Statement PKG 171125

Final Audit Report

2025-11-27

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