



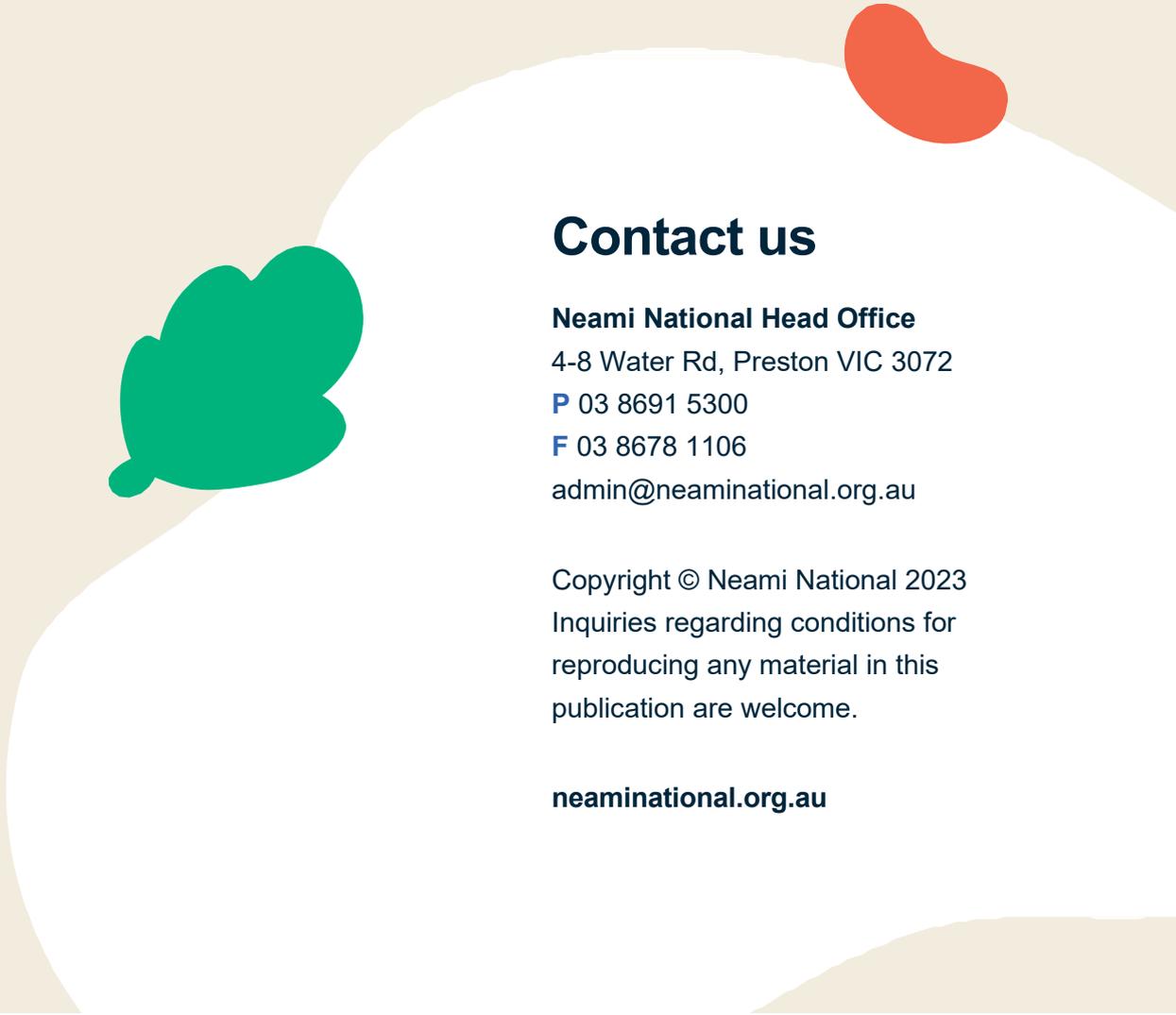
Neami Limited Modern Slavery Statement 2024-25

December 2025



Acknowledgments

Many thanks to everyone who contributes to ethical organisational procurement practices and supply chains.



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Introduction

Neami Limited (Neami) believes that freedom from slavery (in all its forms) is a fundamental human right and operates to limit the risk to modern slavery as part of our zero-tolerance approach to any form of slavery in our operations and supply chains.

The Neami Modern Slavery Statement has been drafted by Neami to meet the mandatory reporting requirements for entities with a consolidated revenue of more than \$100m found in the *Modern Slavery Act 2018* (Cth) ('the Act').

This statement covers the reporting period from 1 July 2024 to 30 June 2025. It outlines the steps Neami has taken to identify, assess and manage the risk of modern slavery in Neami's operations and supply chains.

The Act outlines seven mandatory criteria to be covered by the statement, including:

- Identifying the reporting entity
- Describing the structure, operations and supply chain of the reporting entity
- Describing the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns/controls
- Describing the actions taken by the reporting entity and any entity the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes
- Describing how the reporting entity assesses the effectiveness of such actions, and
- Describing the process of consultation with any entities the reporting entity owns/controls
- Providing any other relevant information

Modern Slavery describes situations where an individual is deprived of freedom for commercial gain and in violation of their human rights. The Act includes eight types of serious exploitation:

- Trafficking in persons
- Slavery
- Servitude
- Forced marriage
- Forced labour
- Debt bondage
- Deceptive recruiting for labour or services, and
- Child labour (situations where children are subjected to slavery or similar practices or engaged in hazardous work).

About Neami

This section identifies the reporting entity and describes the structure, operations and supply chain of the reporting entity.

Overview

Neami supports people to achieve the wellbeing and mental health outcomes that matter to them. We provide services across Australia supporting mental health and wellbeing, housing and homelessness, and suicide prevention.

We're proud to support 34,000 people living with mental health challenges each year across Australia and offer services in over 40 different Indigenous lands.

Our approach is based on evidence; what has been proven to work and what people tell us helps. We adjust and improve our approach to make sure that we're doing the very best we can.

We value lived and living experience. We try to learn from people's personal experiences of mental health challenges, adversity and interactions with support services. We use what we learn to design and influence our programs and services.

As one of Australia's largest providers of mental health services, we advocate for system change to improve lives.

We know the mental health system can work better. We passionately encourage reforms that reflect lived and living experience and give people choice.

Neami Group Structure

Neami Limited trading as Neami National is a not-for-profit, public company, limited by guarantee. Neami Limited has a wholly owned subsidiary, Mental Health and Wellbeing Australia Limited (MHWA Ltd). Both organisations are registered with the Australian Charities and Non-for-profits Commission (ACNC) and provide group reporting to the ACNC.

The Neami head office is located at 4-8 Water Road, Preston, Victoria.

Neami is governed by a [Board of Directors](#). The Board provide leadership, set the strategic direction and model the culture of Neami. The Board place Neami's vision and purpose at the centre of decision making, act in the long-term interests of Neami and guide and monitor the management of Neami to innovate and thrive in accordance with Neami's Constitution, values and risk appetite.

Day-to-day operational management of the organisation is delegated to the Executive and [National Leadership Teams](#), led by the Neami Chief Executive Officer, Tom Dalton.

MHWA Ltd is governed by a smaller Board of Directors which provides governance and strategic oversight. In June 2021, the Neami Group made the strategic decision to transition out of National

Disability Insurance Scheme (NDIS) service provision and MHWA ceased operations in November 2021. MHWA Ltd remains part of the Neami Group as a dormant entity. MHWA Ltd is in the process of being wound up.

Neami Operations

Neami provides mental health and wellbeing services to support people to improve their quality of life in ways that are important to them. We do this across four key service areas:

- Mental Health Hubs
- Community Connection and Wellbeing
- Safety and Homelessness
- Integrated Support.

Neami's revenue is predominately derived from state and federal government funding, including via Primary Health Networks (PHNs).

As at 30 June 2025, Neami:

- Operated in Victoria, New South Wales, South Australia, Western Australia, the Northern Territory and Queensland.
- Employed more than 1300 employees.
- Supported more than 34,000 consumers.
- Had a consolidated revenue of \$151,304,886.

More information about Neami can be found here in our [2025 Annual Report](#).

Neami Supply Chains

Neami manages approximately 1305 suppliers that provide goods and services to the organisation. Excluding staff, consumer and internal provider costs, Neami's creditor expenses for the financial year ending 30 June 2025 was \$38,192,991.

Suppliers include:

- Landlords and leasing agents
- Consortium partners
- Information Technology providers of assets and services
- Cleaning services
- Building fit-out and construction companies
- Temporary/contracted staff and Contractors
- Consultants, including Auditors, Architects, Investment Advisers, Publicity and Communications
- Vehicle lessors
- Insurance companies
- Communications providers

The two highest spends were property leases (\$7.0m) and relate only to Australian premises sourced through estate agents, and consortium partner costs (\$7.8m), which are payments to other Australian providers that co-deliver services with Neami.

Information technology expenses (\$3.3m) was the third highest supplier cost. Neami endeavours to contract with Australian companies in this space. However, most IT equipment is manufactured overseas and key IT providers, such as Amazon Web Services, are also located overseas.

Companies directly linked to Neami supply chains, such as Lenovo and Amazon Web Services have modern slavery statements available for review. Their initiatives to reduce modern slavery are similar and include human rights principles or policies, codes of business conduct and ethics and supply chain standards.

Neami's investments are undertaken in consultation with their external investment advisors and in line with the Neami Investment Policy and reference to frameworks including the United Nations Principles of Responsible Investment. Neami's investment advisors undertake ethical investment scanning and reporting monthly.

Modern Slavery Risks

This section describes the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns/controls.

Modern Slavery Risk Assessment

Neami has carried out a risk assessment process of modern slavery risks for the financial year ending 30 June 2025. This risk assessment process considered Neami's operations and supply chains and any potential links to modern slavery including the potential to cause, contribute to, or be directly linked to modern slavery.

Overall Neami assessed the risk of modern slavery practices occurring within Neami's operations and supply chain to be low.

In Our Operations

Labour exploitation risks include vulnerable populations due to age, being migrant workers and low skilled workers, in addition to forced overtime.

The risk of Neami causing modern slavery practices in our directly employed workforce is very low. Most Neami workers are employed directly, and the terms and conditions of their employment are managed by enterprise agreement or modern awards. This is in line with the highly regulated Australian labour market. Neami also acknowledges the presence of unions to represent workers and complies with occupational health and safety measures and legislation to protect workers.

Neami strives to be an employer of choice and works towards improving employment conditions on an ongoing basis. During the current reporting period, Neami continued to deliver against our current strategic directions including via strategic implementation plans to further our strategic themes of 'sustainable and resilient organisation' and 'capable and diverse workforce'. Neami also undertook a Position Standardisation and Classification Review process to ensure roles were appropriately classified and remunerated, resulting in the positive reclassification of some roles. Neami also provided a submission to the Fair Work Commission regarding the gender undervaluation review for the SCHADS Award.

Neami has robust recruitment processes that promote fairness and include 'right to work' and qualification checks, and ensures all employees are above minimum working age, in line with relevant Australian employment legislation. Where recruitment agencies are engaged only reputable leading agencies are selected.

Neami's policies and procedures address bullying, harassment and discrimination, as well as working standards and work flexibility.

Neami does engage workers through labour hire agencies (\$2.0m). Neami reviews labour hire contracts and is conscious of ensuring payments are in line with Australian employment standards

and legislation. Most staff engaged through labour hire agencies are professional medical staff including medical practitioners and nurses.

Cleaning contractors (\$1.1m) have also been identified by Neami as another area requiring conscious contracting to ensure ethical practices are upheld. Contracts are reviewed and considered from an ethical perspective.

In Our Supply Chain

Within the Neami supply chain, the risk of modern slavery practices would be linked to product categories and country of origin.

Based on the [2023 Global Slavery Index](#), the top products at risk of modern slavery imported into Australia are electronics such as laptops and mobile phones. Electronics are the highest value product at risk of forced labour imported into G20 countries (2023 Global Slavery Index). Electronics are generally imported into Australia from China and Malaysia (2023 Global Slavery Index).

Neami is most likely to be linked to modern slavery with the purchase of IT hardware items originating in Asia.

Neami procurement practices are considerate of modern slavery practices. Neami engages contractors and suppliers using fair contract terms and undertakes due diligence before appointing new suppliers.

Where possible, Neami reviews supplier modern slavery statements.

Due Diligence and Remediation

This section describes the actions taken by the reporting entity and any entity the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.

Operational and Supply Chain Due Diligence

Neami continually monitors operations and supply chains to ensure Neami remains at a low risk of causing or contributing to modern slavery practices. Neami's Social Impact Strategy (2024-2034) includes a focus on spending and investing money ethically and consciously to address social and economic inequities.

Neami continues to operate in an industry with minimal interaction with key modern slavery product categories and/or high-risk countries. Neami periodically undertakes internal audits of its operations to ensure effective policies, practices and procedures are in place and that risks are mitigated. An internal audit of Neami's procurement practices was undertaken as part of Neami's 2022-23 Strategic Internal Audit Plan. No supply chain issues were identified.

Grievances and Remediation Processes

Neami prides itself on protecting and respecting human rights across all operations and supply chains. This is reflected in Neami's Investment Policy, Advocacy Strategy, Social Impact Strategy, Strategic Directions and Collaborative Relational Practice approach.

Neami has a Whistleblower Policy, updated in 2024, and Staff Complaints Policy which promote open communication throughout Neami, facilitate the development of ethical practices and safeguard the reputation, values and ethics of Neami. During the reporting period, Neami did not receive any notifications or reports under the Whistleblower Policy.

Where modern slavery risks are identified within Neami's operations or supply chains, Neami will:

- Engage with the relevant supplier to develop an appropriate resolution.
- Engage to support the relevant supplier to understand the issues of modern slavery risks.

Effectiveness Measures

Neami believes strongly in continuous improvement and regularly reviews actions being taken to reduce and eradicate modern slavery.

As part of the effectiveness measures, aspects of modern slavery avoidance are noted on the Neami risk register under multiple risks, including 'partnering, outsourcing and contracting' and 'compliance'. Neami continues to mitigate risks to lower their ratings.

Prior to Neami's next modern slavery statement submission Neami will continue to:

- review of supply chain risks.
- engage with suppliers to understand their modern slavery risk mitigation strategies and review modern slavery statements for key risk suppliers.
- oversee Neami's current Investments and Investment Policy to proactively invest in ethical organisations in line with Neami's Social Impact Strategy.
- review procurement procedures to ensure best practice.

Consultation

Neami had shared corporate support functions when the subsidiary, MHWA Ltd was active. Neami also had Group policies and procedures. Engagement of suppliers and purchase of goods was centralised. This ensured consultation with both entities was open-ended.

Governing Body Approval

This statement was approved by the Board of Neami Limited in their capacity as principal governing body of Neami Limited on 15 December 2025.



Ruth Faulkner – Director and Board Chair of Neami Limited

15 December 2025

More information

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We acknowledge Aboriginal and/or Torres Strait Islander peoples and communities as the Traditional Custodians of the land we work on and pay our respects to Elders past, present and emerging. We recognise that their sovereignty was never ceded.

Neami celebrates, values and includes people of all backgrounds, genders, sexualities, cultures, bodies and abilities.