



Modern Slavery Statement

2023/24





ABOUT

Campaign

Modern Slavery Statement

Reporting period

30 June 2023 – 1 July 2024

This Modern Slavery Statement has been approved by the Minda Inc Board of Directors on 18 December 2024.

Signed

Joanne Denley
Board Chair





Minda’s Modern Slavery Statement 2023-24

Minda Incorporated (Minda) is a reporting entity under the *Modern Slavery Act 2018 (the Act)* and is required to prepare an annual statement to meet the seven mandatory criteria for the reporting period. Minda’s reporting period is 1 July to 30 June. This statement covers the year ended 30 June 2024 and is published in accordance with the Act.

Criteria 1 Our Reporting Entity

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

- 1) Minda Incorporated 37 020 000 711 (Minda Inc)
- 2) Minda Housing Ltd 49 622 248 908 (Minda Housing)
- 3) S.A. Group Enterprises (SAGE) Incorporated 40 005 498 775 and its subsidiaries:
 - a) Repack Pty Ltd 98 169 124 145
 - b) Wine Storage & Logistics Pty Ltd 27 120 955 124

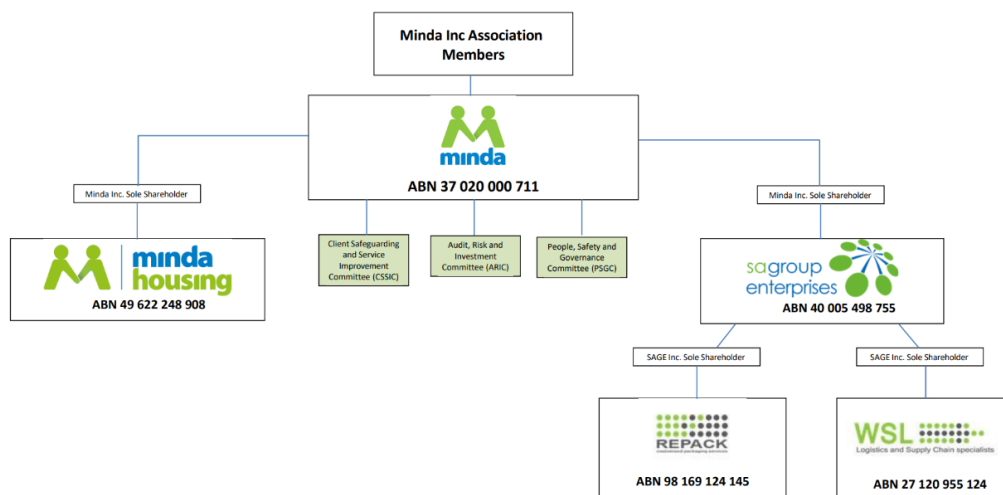
Minda and SAGE are incorporated under the Associations Incorporation Act 1985 (SA), while Minda Housing is limited by guarantee under the Corporations Act 2001 (Cth) as are SAGEs subsidiaries.

Under the Associations Incorporation Act, the Minda Inc Board (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 the Minda Group business operations.

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. *Minda’s Governance Framework* promotes meaningful and effective roles for the Controlled Entities’ boards without compromising the overall Minda Group governance.

The Board’s objective is to provide independent governance and ensure peak operations such as finances, acquisitions, residential standards, and corporate identity are performing to the highest level and meeting the needs of people supported by Minda.

Criteria 2 Our Structure and Governance





The Minda Group is an approved reporting group with the ACNC. Minda focuses on creating meaningful life-long relationships with the people we support and their family and friends rather than ‘transactions’. We want to:

- walk alongside people helping them navigate their life journey and provide support as appropriate along the way.
- contribute to creating an inclusive community where the voice of people with intellectual disability is heard and acted upon.
- offer more people with intellectual disability to live independently in a place of their choice, have stronger friendships and relationships, and be better connected to their communities.
- have our staff and services to add value to the lives of people with intellectual disability in the support they provide.

We are guided by Our Values of Respect, Heart, Opportunity, and Community:

- **Respect:** We respect the right of a person living with an intellectual disability to self-determination in living their best life.
- **Heart:** We demonstrate care and love for those we support in all that we do.
- **Opportunity:** We focus on the positive and what people can do rather than what they cannot do.
- **Community:** We recognise the importance of community to a person’s well-being and strive to create an inclusive community where people are valued.

This is embedded within *Minda’s Strategic Plan 2022-2025*.

Our Policies and Procedures.

We value and comply with all laws within corporate social responsibility, industrial disability standards, environmental obligation, workplace safety protection and regulation, and employee inclusion and diversity.

Our practice, policies and procedures have zero tolerance for violence, abuse, neglect, exploitation and discrimination of any form and the policies and procedures apply to all employees, contractors, temporary agency workers, students on placement and volunteers. The Board or Executive Leadership Team reviews and approves policies and frameworks, and substantiates itself with effective systems of compliance, risk management and internal control.

In the year ending 30 June 2024, a review of the hierarchy of policies within the Minda Group was undertaken with a focus on defining our core policies that sit at Board level. These include our:

<i>Human Rights Board Policy</i>	Promotes human rights practice to embed in our decision making.
<i>Governance Board 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>Client Safeguarding Board Policy</i>	Provides guidance on how Minda promotes and protects the safety and wellbeing of its clients.
<i>Feedback and Complaints Board Policy</i>	Outlines the effective management of Minda’s feedback and complaints system ensuring it is transparent, accessible, inclusive, and responsive.
<i>Investment Board 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 Board 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 Board 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 Board Policy</i>	Outlines the commitment Minda has regarding the safety of workers in both the physical and psychosocial environment.



Criteria 3 Minda's Operations and Supply Chain

Our Operations and Services

Minda's vision is to be a leading force for good within Australia in supporting people living with an intellectual disability in all aspects for their lives. Our mission is to provide advocacy, support, and services to enable people living with an intellectual disability to live their best lives.

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. We provide a range of services to more than 1,185 clients living with disability 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 believes that every person has the right to make choices that give them as much control over their own lives as possible. Even the smallest of decisions can bring joy to a person in their everyday life. 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".

The Board has established subcommittees to, among other activities, oversee and monitor the effective management of human rights-related risks, including modern slavery.

- The People, Safety and Governance Sub Committee (PSGC) assists the Board in its responsibilities in relation 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 the client safeguarding and quality systems and outcomes supporting Minda clients to live their best lives.
- Audit, Risk & Investment Committee (ARIC) oversight responsibilities in relation to corporate reporting processes, including financial reporting, investment management, risk management and internal control, external audit, internal audit, and compliance.

These subcommittees will broadly consider the identified actions within Minda's Modern Slavery Statement and how they are addressed and actioned more across the Minda Group with PSGC having oversight of the *Minda Human Rights Board Policy* and *Minda Governance Board Policy* and the actions identified in this Statement.

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 as set down by *Minda's Governance Framework*.

Our Employment

Minda employs over 2,000 people (including 278 supported employees) and 246 active volunteers and provide supports to over 1,185 people. Our manufacturing operations support these objectives by incorporating supported employment programs within:

- Electronic Recycling services: dismantling, sorting and shipment of recyclable products.
- Manufacturing and Packaging Services: packaging, sorting, collation, and quality inspection, bespoke timber products manufacturer and metal fabrication.
- Facilities Services: professional commercial and personal laundering, food services, gardening, and cleaning services.
- Graphic Design Services: professional commercial graphic design services.

These programs are tightly bound by the *Fair Work Act* and their regulations, and the *Supported Employment Services Award* as applicable. Our diverse social enterprises are Social Traders certified and provide meaningful work opportunities to over 350 South Australians with disability. By focusing on the individual and identifying strengths, we ensure that we match people to workplaces resulting in meaningful work opportunities for our employees, boosting skills and confidence levels in inclusive workplaces.

Our Supply Chain

Minda's supply chain includes suppliers and contractors to deliver a range of products and services that are needed to operate on a day-to-day basis including but not limited to soft and hard facilities management, preventative and reactive maintenance, utilities, waste management, fleet operations, equipment and furniture for offices and supported programs.

Our direct suppliers are predominantly Australian based, which is viewed as a low-risk area for modern slavery. We commit to continue to comply with all laws governing workplace safety, corporate social responsibility, and employee inclusion and diversity. We expect our suppliers and contractors to operate in accordance with all applicable modern slavery legislation – including other overarching universal Commonwealth legislations.

Impacts of Covid-19

Minda recognises the ongoing impacts of Covid-19 in its supply chain operations and its potential impact to vulnerable workers. 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.

Our policies continue to adapt to address these risks through mitigating risk of exposure to modern slavery through social distancing and related safeguarding measures for those in our immediate and extended community.

Our Progress to Date

This is Minda's fourth statement, and we recognise that our main area of modern slavery risk comes from external supply chains and our direct and indirect workforce.

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| ▪ Uploaded Minda's approved Modern Slavery Statement 2022/23 to Minda's website and intranet pages. |
| ▪ Ongoing assessment of all new and existing suppliers within both the procurement and contract engagement. |
| ▪ Update and implementation of Worker Wellbeing Policy and Whistle Blower Policy to ensure we have appropriate protections in place |
| ▪ Ongoing assessment of all new and existing suppliers of casual labour hire and contractor engagement |

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.

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.

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:

- 1) Identification and assessment.
- 2) Prevention and mitigation.
- 3) Tracking and responses.
- 4) Communicating how impacts are addressed.

Minda will necessitate specific commitments to undertake ongoing 'Due Diligence' to identify, prevent and mitigate adverse impacts of modern slavery within our business operations and ensuring our policies and procedures meet our requirements and responsibilities to ethical business conduct.

Identification of Risk and Assessment

We are committed to:

- 1) Continue to implement a systematic review of our supply chain and operational practices regarding modern slavery.
- 2) Implement a strategic risk review of actual and potential risk and human rights impacts that may be caused by our actions or inactions.
- 3) To continue to mitigate impacts of modern slavery through continual assessment of our business operations and practice standards.
- 4) To cease the action of any business undertakings that contribute to the proliferation of modern slavery through our operational practices.
- 5) Consider Provide appropriate remedies to staff competency and awareness by developing easy-read modern slavery resources, and development of staff training.
- 6) Leveraging our understanding to mitigate risks of modern slavery and collaborating with our suppliers to rectify issues if an identified risk arises.

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

Criteria 5 Assessing Effectiveness

While Minda is not aware of any modern slavery practices within our supply chain, we have undertaken several coordinated actions to mitigate the potential risk of modern slavery in this reporting period including:

- Assessing the potential modern slavery risks in our operations and supply chains, with emphasis on high spend suppliers.
- Identifying the contracts that Minda has in place with its supply chain.
- Including modern slavery in its forward plan for internal audit processes.
- Reviewing effectiveness of due diligence practices.
- Identifying our policies that need updating to be inclusive of modern slavery in operations and supply chains.

Our Plan for the Future

Minda intends to progress the following deliverables against its key focus areas:

- Refine the processes and requirements for engaging with all suppliers for goods, services and works outside of a procurement process including assessing third party risks not limited to just modern slavery.
- Include modern slavery as an agenda item on our *People, Safety and Governance Committee* to assist the Board in its responsibilities in relation to governance, people, health and safety strategies, including client wellbeing, compliance obligations, performance and culture.
- Develop training obligations as part of *Service Excellence Policy Governance and Operational Management* with a focus on modern slavery obligations and requirements to educate and inform our staff and volunteers to reduce modern slavery.
- Review and update our contractor management framework to ensure that ongoing discussions with our supply chain incorporate safeguarding measures against potential modern slavery risks.
- Consideration of modern slavery as a key risk focus within our strategic risk register.
- Where suppliers are not Australian based, for example overseas software companies, a statement of compliance in relation to Modern Slavery and Human Trafficking will be incorporated as a mandatory requirement.

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. Under *Minda's Governance Framework*, the Board has 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 18 December 2024 meeting and is signed by the Chair of the Board.