

# Modern Slavery Statement FY24

August 2024





# Contents

## 01

---

About this statement Page 3

## 02

---

Our operations and supply chain Page 6

## 03

---

Understanding our modern slavery risks Page 09

## 04

---

Our actions to address risks Page 13

## 05

---

Assessing our effectiveness Page 18

## 06

---

Consultation and approval Page 20



# 01

## About this statement

# About this statement

## Reporting Entity

The Motor Accident Insurance Board (ABN 93 610 406 210) has prepared this Statement under the Australian *Modern Slavery Act 2018* (Cth) (the Modern Slavery Act).

## Mandatory Criteria

This Statement describes how we have assessed and addressed modern slavery risks in our operations and supply chain for the financial year dated 1 July 2023 - 30 June 2024 (FY24) (the Reporting Period).

**This Statement addresses the seven mandatory reporting criteria under the Modern Slavery Act. The table below indicates where within this Statement each criterion is addressed.**

Mandatory reporting criteria	Section
Identify the reporting entity	This page
Describe the reporting entity’s structure, operations and supply chains	2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	3
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	4
Describe how the reporting entity assesses the effectiveness of these actions	5
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	6
Any other relevant information	N/A



## OUR VISION

---

**Supporting  
people  
impacted by  
road trauma.**

## OUR COMMITMENT

---

The Motor Accidents Insurance Board (MAIB) recognises that modern slavery is a crime and a violation of fundamental human rights. We are aware that modern slavery takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

In line with our values and behaviors the MAIB is committed to ensuring that there is no modern slavery or any scope for modern slavery in our supply chain or in any part of our business operations.

This is the MAIB's first statement and consistent with our strong business conduct mechanisms we will continue to encourage and strive towards a culture where all employees are aware of their responsibilities in identifying any potential modern slavery practices and bringing it to the attention of the Board of Directors.





# 02

**Our  
operations  
and supply  
chain**

**MAIB**  
Service·Support·Safety

# Our operations

## About the Motor Accidents Insurance Board

The Motor Accidents Insurance Board (MAIB) is a Tasmanian Government Business Enterprise (GBE) which operates the compulsory third party insurance scheme for Tasmania. The scheme provides medical and income benefits on a no-fault basis to people injured as a result of a motor accident while enabling access to common law.



### Care for the seriously injured

The MAIB has purpose-built accommodation for the seriously injured in Hobart, Launceston and Ulverstone to foster the independence of residents. To support this objective, ‘transitional’ units have been constructed on existing complexes. This allows a person who is progressing towards independence the opportunity to do so in a supportive environment prior to moving back into the community.

The accommodation also provide a valuable role in filling a gap which often exists when people are ready for discharge from hospital but renovations to their own home may not have taken place or been completed.

The management of these facilities has been outsourced to Anglicare Tasmania.



### Our Investments

The MAIB adopts a diversified investment strategy which seeks to maximise long term returns within acceptable bounds of risk. The portfolio is invested in a range of asset classes including domestic and international equities, infrastructure, property, diversifying alternatives, Australian bonds and cash.

The investment strategy is reviewed annually, with reference to the long-term nature of the outstanding claims liability, and the requirement to maintain a balance between the achievement of sustainable commercial rates of return and premium affordability.

The management of portfolio is outsourced to Fund Managers.



### Road Safety Funding and Community Support

The MAIB provides in excess of \$5.2 million to a wide range of community, Government and other organisations in Tasmania through various funding arrangements, grants and sponsorships.

The funding is primarily focused on efforts to improve road safety and motor accident outcomes and includes a \$4.1 million contribution to the education and enforcement strategies of the Road Safety Advisory Council.

# Our supply chain

MAIB’s supply chain can be grouped into 3 broad categories.

		
<b>01</b> INVESTMENTS	<b>02</b> HEALTH CARE PROVIDERS	<b>03</b> CORPORATE SUPPLIERS
<ul style="list-style-type: none"><li>• Investment Advisors</li><li>• Fund Managers</li></ul>	<ul style="list-style-type: none"><li>• Supported Accommodation</li><li>• Rehabilitation Providers</li><li>• Hospitals</li><li>• Equipment and Medical Supplies</li></ul>	<ul style="list-style-type: none"><li>• Technology</li><li>• Financial and Professional Services</li><li>• Property Services/Facilities</li><li>• Human Resource</li><li>• Legal advisors</li><li>• Insurance</li><li>• Reinsurance</li><li>• Printing Services</li><li>• Office Support and Administration</li></ul>

Within our operations and supply chain we have:

<b>Tier 1 (T1) suppliers</b> - Suppliers that provide goods and/or services to the MAIB.	<b>Tier 2 (T2) suppliers</b> - Suppliers that provide goods and/or services to MAIB’S Tier 1 suppliers.	<b>Tier 3 (T3) suppliers</b> - Suppliers that provide goods and/or services to MAIBs Tier 2 suppliers.
--	---	--





# 03

## Understanding our modern slavery risks

# Identifying modern slavery risks



## Defining ‘modern slavery’

We understand the term ‘modern slavery’ to include:

- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage
- The worst forms of child labour

Modern slavery risk describes the potential adverse harm to people that a business can have across their operations and supply chain.



## Identifying modern slavery risks

We acknowledge that there are inherent modern slavery risks within our business that need to be addressed as part of our responsibility to respect human rights. In the Reporting Period to which this Statement relates, we did not identify and assess our modern slavery risks. However, we started to work with human rights specialists in the current period to identify key areas of inherent modern slavery risk across our operations and supply chain, which we are disclosing in this Statement (see pages 11-12) and will form the basis of our next Statement. We acknowledge that these identified areas of inherent modern slavery risk were present in our business during the Reporting Period.

The following four inherent risk indicators were considered as part of our inherent risk identification process:

1	<b>Vulnerable populations</b>	People and communities that are inherently more vulnerable than others to experiencing modern slavery and its impacts. Examples include base-skilled labour, migrant labour and non-native language speakers.
2	<b>High risk sectors and categories</b>	Certain sectors and categories are more likely to contribute to modern slavery due to prevalent labour rights issues throughout the value chain. Examples include cleaning and security services, logistics and transport, mining and processing of conflict minerals.
3	<b>High risk business models</b>	Certain businesses and supply-chain structures that limit visibility of workers and their working conditions are associated with modern slavery. Examples include outsourcing and labour hire, aggressive pricing strategies, long and complex supply chains and seasonal labour demand.
4	<b>High risk geographies</b>	Modern slavery is more likely to occur in geographic areas where there is a weak rule of law, conflict, corruption, displacement and poor adherence to labour laws.

We recognise that where these inherent risk indicators intersect, there is an increased possibility that actual harm to people is being experienced. Our analysis identified key areas of high risk that we will manage and report on in our FY25 modern slavery statement (see pages 11-12).



# Our modern slavery risk areas

Area	Description	Description of identified inherent risk indicators
Health Care	The MAIB engages with multiple public and private healthcare organisations including hospitals, smaller healthcare providers, accommodation and rehabilitation providers, which provide health treatments, rehabilitation support, ongoing daily and disability care and accommodation.	<ul style="list-style-type: none"> <li>• Vulnerable populations involved with the health care service include high proportions of female workers and migrant workers who are susceptible to exploitation.</li> <li>• The complex mix of public, private and not-for-profit businesses, multiple contracting tiers and common use of third-party recruitment are all considered high risk business models for modern slavery.</li> <li>• Health care is considered a high-risk category for modern slavery due to a confluence of risk factors in relation to its operating and procurement activities, including prevalence of contingent and base-skill workers and frontline worker vulnerability.</li> </ul>
Medical equipment	A range of medical equipment for patient care and ongoing daily support is procured directly and indirectly (via healthcare providers) by the MAIB. This includes medical equipment such as first aid supplies and disability support equipment.	<ul style="list-style-type: none"> <li>• Vulnerable populations such as children, migrant workers and women, are commonly engaged in the production of medical equipment in medical supply chains.</li> <li>• Business models associated with the production of medical equipment, including high rates of casual labour and subcontracting, create limited visibility of working conditions for the MAIB. The medical equipment industry is also susceptible to peak demand periods with increase the risk of forced labour practices to meet supply demand. This was evident during the COVID-19 pandemic.</li> <li>• The medical equipment industry is considered a high-risk sector for modern slavery due to reports of child and forced labour within the sector, particularly in Asia.</li> <li>• High risk geographical areas for modern slavery are associated medical equipment production, particularly in parts of Malaysia, Pakistan and China.</li> </ul>
Facilities cleaning services	The MAIB engages cleaning services directly and for its head office and indirectly for its accommodation facilities located in Hobart, Launceston and Ulverstone.	<ul style="list-style-type: none"> <li>• Cleaning services often have low barriers to entry and high proportions of temporary migrant workers whose immigration status is precarious, who speak limited English, have limited social networks and limited knowledge of their workplace rights. These workers tend to be more susceptible to exploitation.</li> <li>• Subcontracting arrangements for cleaning staff for the MAIB's facilities mean there is low visibility over labour conditions for workers. Cash-in-hand payment and lack of employee entitlements is common in the cleaning industry.</li> <li>• Withholding of wages, immigration related coercion and threats, deceptive recruitment, excessive overtime, debt bondage, confiscation of personal and travel documents, dangerous and substandard working conditions have been reported within cleaning services in Australia, making this a high-risk category of services.</li> </ul>

# Our modern slavery risk areas (Cont.)

Area	Description	Description of identified inherent risk indicators
IT Hardware	The MAIB procures a range of IT equipment for its office, including laptops, monitors, keyboards and headsets. The MAIB also periodically organises recycling of IT hardware that is at its end-of-life with a specialist IT hardware recycling organisation.	<ul style="list-style-type: none"> <li>• The complex and long supply chains associated with IT hardware products creates limited visibility for the MAIB, creating an inherent risk of modern slavery.</li> <li>• IT hardware is well-documented to be a high-risk category for modern slavery. This product category and its supply chains have deeply entrenched issues with incomplete employment information, mandatory overtime, worker-paid recruitment fees and controlling/withholding of personal documentation (i.e. passports).</li> <li>• The raw materials used in IT hardware is mined predominantly from high-risk geographies such as the Democratic Republic of the Congo.</li> <li>• The use of forced labour to manufacture IT hardware has been reported in high-risk geographical areas such as India and China.</li> <li>• IT recycling services process some material offshore in parts of Asia which are considered high-risk.</li> </ul>
Investment portfolio	The MAIB invests in multiple international and domestic markets and across a variety of funds including emerging market equities, listed and unlisted property funds, international bonds and cash. The MAIB engages investment advisors and fund managers to undertake global investments on its behalf.	<ul style="list-style-type: none"> <li>• Due to the wide array of investments, there is a potential intersection with a range of vulnerable populations, creating an inherent risk of modern slavery in this area of the MAIB's value chain.</li> <li>• The large number of complex value chains associated with the MAIB's investment portfolio present a heightened difficulty for the MAIB to gain adequate visibility into working conditions and the protection of labour rights, creating a high-risk business model. Investment due diligence may not currently address risk appropriately or at all.</li> <li>• There is general potential exposure to higher risk categories and sectors for the MAIB's investment portfolio.</li> <li>• Given the breadth of the MAIB's investments and multiple investments being made in the international market, high risk geographies are likely to be present in the MAIB's investment portfolio.</li> </ul>
Office supplies	The MAIB procures office supplies such as stationary for its head office. Suppliers of stationary products are generally Australian-based re-sellers and aggregators.	<ul style="list-style-type: none"> <li>• Workforces engaged in the manufacturing of stationary products or refinement of paper-based product production commonly include vulnerable populations including children, migrant workers and women.</li> <li>• There is a heightened risk of modern slavery in supply chains of stationary products due to these goods often being procured by aggregators and re-sellers of products with long and complex supply chains. This obscures the MAIB's visibility of labour standards down the supply chain.</li> <li>• Direct stationary suppliers are based and operate in Australia; however, manufacturers of office products are often located in higher risk geographies including Malaysia, India, Vietnam and China.</li> </ul>





04

Our  
actions to  
address risks

**MAIB**  
Service·Support·Safety

# Our actions to address risks

## Modern slavery commitment and policies

We have undertaken a review of policies and procedures that play a role in embedding ethics throughout our business and what we expect from our suppliers, consultants and contractors working with or for the MAIB. The following are those that are most relevant to preventing modern slavery.

Policy	Description	Implementation actions
Human Rights Policy	Our commitment to human rights and addressing modern slavery risks in our operations and supply chain.	Development and drafting of a Human Rights Policy commenced in FY24.
Employee Code of Conduct	The expected behaviours of our employees.	Updated in F24. Annual training module completed, and employees acknowledge understanding of requirements.
Dignity and Respect in the Workplace	Sets out our expectations that all team members treat everyone with respect when at work, when representing our businesses or when interacting with team members outside of work.	Updated in FY24.
Health and Safety Policy	Our commitment to provide a safe and healthy work environment for our employees, members customers, contractors, suppliers and visitors.	Available to all employees on the intranet.
Public Interest Disclosure Act Procedure	Applies to suspected or actual unethical, illegal, corrupt, fraudulent or undesirable conduct, or any breach of the MAIB's Employee Code of Conduct.	Updated in F24. Annual training module completed by relevant team members.
Whistleblower Policy	An anonymous reporting channel for employees (including contractors), their families and associates to raise serious matters they don't feel comfortable raising through other channels.	Updated in F24. Annual training module completed by relevant team members.
Fraud Control Policy	Articulates our commitment to complying with laws and regulations addressing fraud, bribery and corruption.	Updated in F24. Annual training module completed by relevant team members.



# Our actions to address risks



## Stakeholder engagement and governance

The MAIB Board and CEO have overall responsibility for ensuring that the MAIB complies with its modern slavery commitments and legal obligations. The MAIB senior leaders were consulted to understand and map our supply chain.

During the reporting period, we interviewed and reviewed our investment portfolio and top 5 spend healthcare providers to understand the risks of modern slavery in their operations.



## Risk assessment

This year the MAIB commenced due diligence checks focusing on our Healthcare and Investment Portfolio categories. We narrowed the due diligence scope to our top 5 Health Care providers by spend and all Fund Managers.

Introducing a spend threshold criteria to our due diligence activities relating to Health Care providers allowed us to focus on those supplier relationships where we have the greatest leverage. We reviewed 25 suppliers within our high-risk categories. With the Health Care providers in scope, we discussed how they were addressing their modern slavery risks and how we can support each other to improve both our approach and their approach in addressing those risks. 5 out of 6 of our top spend Health Care Providers are submitters under the Modern Slavery Act.

Our Fund Managers, acting on MAIBs behalf have a responsibility to ensure, to the greatest extent possible, that modern slavery does not occur in the companies in which they invest, including in their supply chains. For our Fund Managers and Investment Advisors 18 out of 20 were submitters under the Modern Slavery Act.

## Supplier due diligence outputs

The following are high-level outputs and actions from the review of supplier responses:

- Our direct suppliers have medium to low risk of modern slavery within their own operations.
- Where applicable, suppliers have submitted a modern slavery statement to the relevant regulators/authority. This includes 18 out of 20 Fund Managers and 4 out of 5 of our top spend Health Care Providers.
- A large proportion of our suppliers have policies and procedures in place in relation to modern slavery that were either provided as part of their response or referenced as publicly available documents. These included; Human Rights Policy, Whistleblower Policy, Supplier Code of Conduct; Quality Management System and Supplier Audit Procedures.
- Our suppliers have undertaken risk assessments and audits as part of their own supplier assessment and due diligence processes.
- The results confirm that many of our suppliers are taking positive actions in terms of modern slavery risk management.

# Grievance mechanisms and remediation

**It is important to have business conduct mechanisms in place that create a safe environment for all that work for and with the MAIB to report acts of potential unethical behaviours.**

## **MAIBs Public Disclosure and Whistleblower**

At the MAIB we are committed to driving the highest levels of ethics and integrity in the way we do business. We understand that this is crucial to maintain the trust of our stakeholders and protect our reputation as an ethical business.

Our values and behaviours, Code of Conduct, and policies guide our everyday conduct. We all have a professional responsibility to speak up and report unethical behaviour.

To support this, we have a Public Disclosure and Whistleblower Policy that provides several mechanisms for concerns and complaints to be raised, with the option to do so confidentially and anonymously. MAIB's Public Disclosure channel can be used by anyone, including suppliers, providers and employees, to raise complaints or concerns about human rights issues.

Our avenues for reporting include a dedicated email address: [PID@maib.tas.gov.au](mailto:PID@maib.tas.gov.au)

All reports received are triaged and investigated by a Public Disclosure Officer appointed by the CEO.

A copy of the Public Disclosure Policy will always be available on MAIB website.

**In FY24 we did not receive any notifications of ethical conduct breaches relating to modern slavery through our business conduct channels.**





# Planned next steps

As a forward-thinking organisation, we recognise the importance of addressing modern slavery and its potential impacts on people within our operations and supply chain. We recognise we are at the early stages of our journey and are committed to taking the steps necessary to build a risk management program that is aligned with good practice.

## Planned next steps

Since the end of the Reporting Period, we engaged external human rights specialists to support us develop a roadmap of actions to strengthen our policy, risk management and grievance and remediation processes in line with good practice. We have taken steps to align our approach with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Modern Slavery Act and associated statutory guidance. Our planned next steps for the coming financial year (1 July 2024 – 30 June 2025) are outlined in the table below.

Action	Description
Review and update Human Rights Policy	<ul style="list-style-type: none"><li>• Review and update the MAIB's draft Human Rights Policy to align with the Modern Slavery Act and relevant international human rights frameworks.</li><li>• Establish a plan to communicate and implement this policy with internal and external stakeholders.</li></ul>
Establish commitment to international frameworks and standards	<ul style="list-style-type: none"><li>• Establish a commitment to comply with international standards to the greatest extent possible, where there is no conflict with local laws in the MAIB's Human Rights Policy.</li></ul>
Define and clarify accountabilities	<ul style="list-style-type: none"><li>• Outline key accountabilities and responsibilities in relation to the MAIB's modern slavery commitment and risk management in the MAIB's Human Rights Policy.</li></ul>
Integrate Human Rights Policy across the MAIB	<ul style="list-style-type: none"><li>• Embed the MAIB's Human Rights Policy and processes consistently across all aspects of the MAIB.</li></ul>
Inherent modern slavery risks	<ul style="list-style-type: none"><li>• Establish an annual review process to assess any operations and supply chain changes which may change the MAIB's inherent risk areas for modern slavery. Ensure this process includes a review of risk management approaches to reflect any emerging risk areas.</li></ul>
Supplier engagement contract terms	<ul style="list-style-type: none"><li>• Establish contract terms outlining the MAIB's modern slavery related requirements for suppliers who are identified as having high inherent risk for modern slavery to agree to.</li></ul>
Integrate modern slavery into risk register	<ul style="list-style-type: none"><li>• Investigate how modern slavery risk could be integrated into the MAIB's risk register as a standalone item or as part of broader ESG risk.</li></ul>
Modern Slavery Statement available on website	<ul style="list-style-type: none"><li>• Make the MAIB's FY24 Modern Slavery Statement accessible to the public via our website.</li></ul>



# 05

## Assessing our effectiveness



# Assessing the effectiveness of our approach

Assessing the effectiveness of our actions is critical for ensuring we understand the impacts of our business on modern slavery and broader human rights, and continually improve our approach. We are committed to evolving our approach to assessing effectiveness over time as business practices and modern slavery risks change.

The MAIB will continue to track the maturity of its modern slavery risk management program and reporting on progress in our Statement. In addition to tracking maturity, we will work on developing key performance indicators to enable us to assess the effectiveness of our evolving approach. The current indicators below will serve as the basis for developing a comprehensive bank of indicators as part of an effectiveness framework over the coming reporting periods.

KPI	
Percentage of our people (via the annual employee culture survey) who positively rate our responsiveness and handling of issues above good	76% of our people
Number of policies reviewed for compatibility or created to support human rights	1 planned 5 reviewed

## Our supply chain

KPI	
Number of suppliers risk assessed in hotspot categories (investment advisors, fund managers, health care providers, medical supply)	25
Number of modern slavery incidents identified in our supply chain	0



06

## Consultation and approval



# Process of consultation

**Senior management has worked together on the activities described in this Statement. We consulted with our in-scope Tier 1 suppliers.**

These consultations help us to understand the views of senior management, as well as our suppliers, regarding modern slavery risks and the steps that need to be taken to assess and address those risks.



**The CEO and MAIB Board have reviewed and approved this Statement.**

A white rectangular box containing a black handwritten signature, which appears to be 'LB'.

**Lance Balcombe**

Chair MAIB Board

A white rectangular box containing a black handwritten signature, which appears to be 'PK'.

**Paul Kingston**

CEO of MAIB