MSWA

Life not limits

# Modern Slavery Statement 2025-2026

# Acknowledgements

MSWA acknowledges the Traditional Custodians of the lands and waters across Western Australia, South Australia and the Northern Territory on which we live, work and deliver our services, and their continuing connection to culture, community and Country. We pay our respects to Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples engaging with this statement.

# Contents page

From our CEO 2

Part one: About MSWA 3

Part two: Supply chain and people 6

Part three: Identifying and assessing modern slavery risks 8

Part four: Our current mitigations 10

Part five: Assessment of effectiveness 11

Part six: Planned mitigations for FY26-27 and beyond 12



# From our CEO

**Modern slavery remains one of the most pressing human rights issues of our time, and MSWA, together with the MS Society SA & NT, is committed to playing our part in addressing it. This is our first Modern Slavery Statement to reflect our combined organisation, extending the awareness, safeguards and rigour we've built in Western Australia across South Australia and the Northern Territory as well.**

Over this reporting period (1 July 2025 – 30 June 2026), we have continued to strengthen how we identify, assess and respond to modern slavery risks across our operations and supply chain. This ranges from new supplier due diligence tools to a more robust procurement governance framework. There is more work ahead and we remain committed to transparency about both the progress we've made and the gaps we're still closing.

Tackling modern slavery isn't something a policy team can do alone. It depends on everyone across our organisation staying alert to it in the course of their own role. I'm grateful for that vigilance and for the trust our Clients, employees and communities place in us as we keep building safer, fairer systems together.



Melanie Kiely
*Chief Executive Officer*



# *Part one*
# About MSWA

MSWA's story starts in 1972, when a small group of people living with multiple sclerosis (MS) came together to form The Multiple Sclerosis Society of Western Australia. They were driven by a simple goal, making sure others in their situation could find the information and support they needed. Over the five decades since, that grassroots effort has grown into a dedicated organisation and today MSWA is a leading disability provider supporting people across Western Australia who live with a broad range of neurological conditions. Direct care sits alongside a second strand of our work, funding vital research into neurological conditions, because improving lives today and building understanding for the future go hand in hand.

Please note that when we refer to "MSWA" throughout this document, we mean MSWA in its entirety, including the MS Society SA & NT, which represents our community across South Australia and the Northern Territory.

## Our purpose

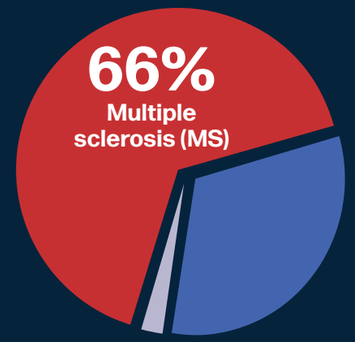
To empower people living with neurological conditions to live their best lives.

## Our impact

### Who we support

MSWA's core Client base is at the centre of everything we do – people living with a neurological condition who receive services directly from MSWA or take part in a MSWA-facilitated program. That support doesn't stop with the Client alone though. Recognising how much a diagnosis can reshape family life, MSWA also extends dedicated services to the carers and family members who provide day-to-day support.

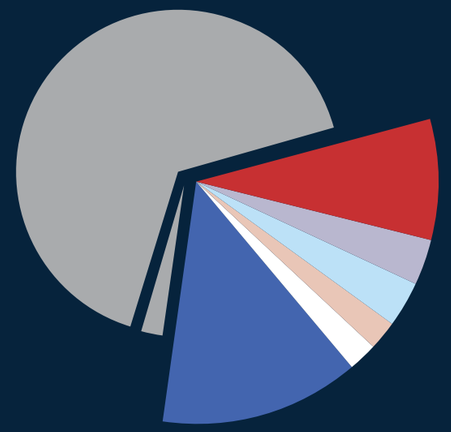
## Our Clients




**2%**
**Support network***

**32%**
**Other neuro**

**This represents carers or family members utilising services such as Counselling in relation to those with neurological conditions.*



### Other neurological conditions

We support a range of other neurological conditions including:

| | |
|---|---|
| Parkinson's disease | 8% |
| Stroke | 3% |
| Acquired brain injury | 3% |
| Motor neurone disease | 2% |
| Huntington's disease | 2% |
| Other neurological conditions | 13% |

## Our legal structure

MSWA is established as a not-for-profit organisation, operating as a company limited by guarantee under Australian law. Under this structure, a Board of Directors provides governance in line with the Constitution and every fund and asset MSWA holds is directed solely towards advancing its mission of supporting people living with neurological conditions.

Because no profits are ever distributed to members or directors, every dollar MSWA generates is reinvested back into services, supports and research. That same not-for-profit accountability carries through to how we choose and manage suppliers, contractors and partners. Ethical practice is a baseline expectation in those relationships, consistent with our obligations under the Modern Slavery Act 2018 (Cth).

## Our operations

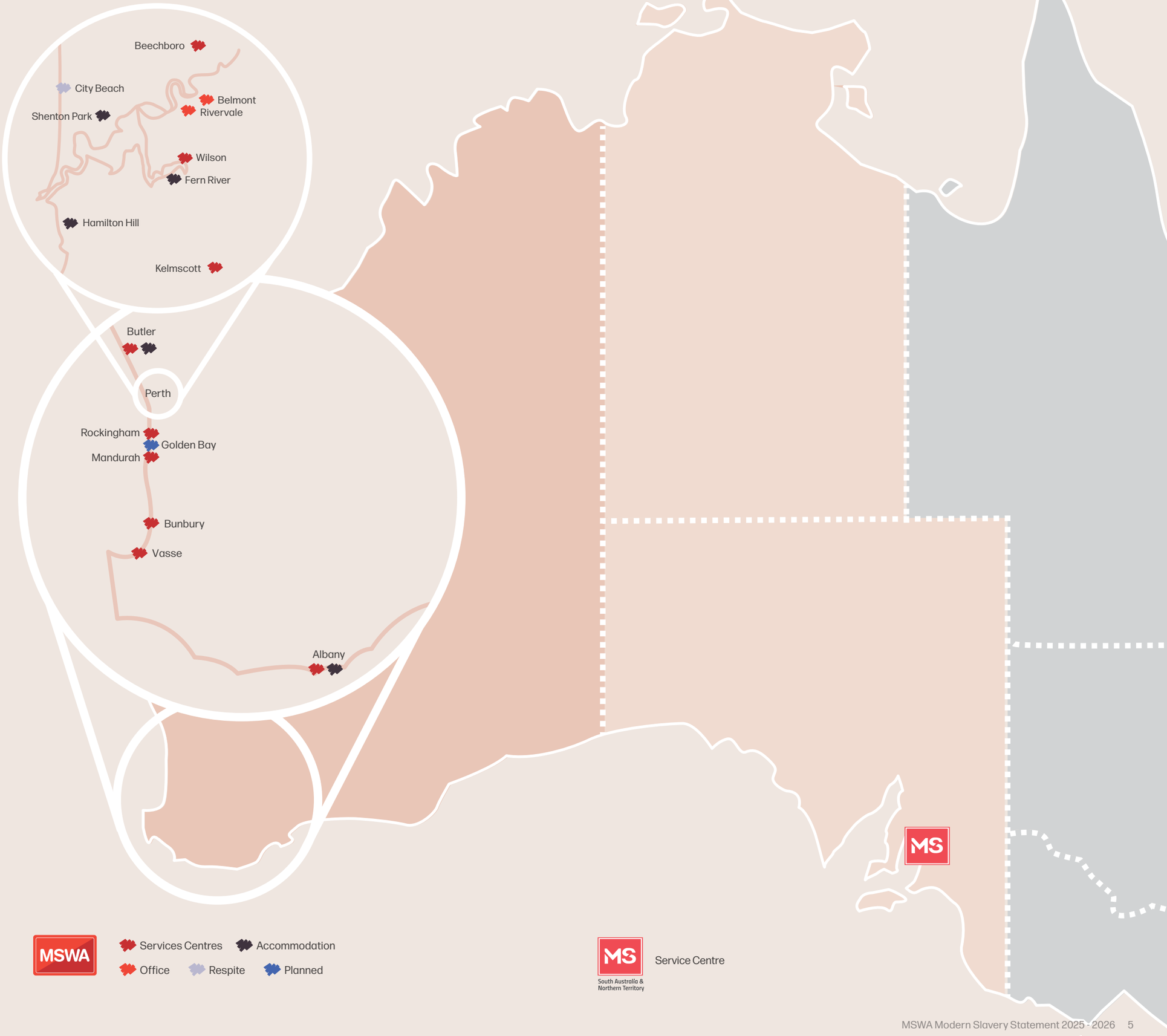
MSWA key services, facilities and operations are located in Western Australia, with a strong presence across the Perth metropolitan area and key regional centres. Following our alignment with the MS Society SA & NT, our footprint now also extends into South Australia and the Northern Territory, broadening our support to more people living with neurological conditions across three states and territories.

### Support services

To meet the diverse needs of our Clients, MSWA offers nursing and allied health services such as counselling, dietetics, occupational therapy, physiotherapy, speech pathology and employment support, all tailored to individual needs. MSWA also empowers people living with neurological conditions to live independently through in-home care and high-support accommodation options so they can choose a level of support that fits their life.

### Lotteries, events and fundraising

MSWA runs lotteries, raffles, events and fundraising initiatives throughout the year, with the funds raised helping Western Australians living with a neurological condition live their version of best.



*Part two*

# Supply chain and people

## Our supply chain

During FY25-26, MSWA worked with 1,733 suppliers, representing total spend of $52m. Of these, 12 suppliers account for spend over $500K, 50 suppliers fall within the $100K – $500K range, and 993 suppliers have annual spend under $1,000. In total, 62 suppliers account for spend of $100K or more, representing 84% of total supplier spend. The large majority of the supplier base is assessed as low risk for modern slavery (88% of suppliers, 54% of spend), with a smaller proportion assessed as medium risk (under 12% of suppliers, 44% of spend) and only 10 suppliers (2% of spend) assessed as high risk; no suppliers fall within the critical risk category. Many of MSWA's higher-spend suppliers have established evidence of compliance on record and several are part of larger parent entities that have published modern slavery statements or reported compliance.

As part of our Client operations, we engaged 537 suppliers, representing 47% of total expenses (including capital expenditure) equivalent to $24.3M in Client Services spend and $9M in operating expenditure. Agency workers account for 11% of Client Services' operating expenditure; other key procurement areas include the construction of a new high-support accommodation facility (MSWA Shenton Park), maintenance of our current facilities, disability and mobility equipment, medical supplies, external brokerage and Client Services-specific IT software. Our lotteries provide a range of prizes, including houses, cars, gift vouchers, package holidays with flights, and electrical and home appliances.

## Our people

MSWA is proud to have just under 800 (786 as of 30 June 2026) employees contributing to the organisation's cause, across Western Australia and South Australia, including 173 new hires during the FY25-26 period. Our workforce spans a range of contract types, including 413 part-time, 238 full-time, 126 casual, seven fixed-term part-time and two fixed-term full-time positions.



*Part three*

# Identifying and assessing modern slavery risks

## MSWA Board responsibilities and governance

MSWA's Board holds strategic oversight of and responsibility for the social risks affecting our business including modern slavery and human rights risks across our supply chain. The Board approves MSWA's vision, purpose and strategic direction, sets our risk appetite and monitors our risk management framework and internal controls. It also fosters a strong culture of corporate responsibility, compliance, accountability and respect for others.

This governance is underpinned by our constitutional documents, Board Charter and Delegation policies, and reinforced through periodic internal and external audits against regulatory and legislative reporting obligations. Audit findings and recommendations are reported to the relevant Board Committee.

The Board carries out its duties with the support of several Subcommittees, made up of Board Members, external advisors and MSWA's Executive team. Representatives from Finance, Procurement, Legal and People & Culture sit on our Modern Slavery Working Group, which reviews modern slavery risks and implements mitigation strategies across our operations. This group also leads the preparation of this statement each year for the Board's review and approval.

## Assessing risks

MSWA takes a structured approach to identifying and managing modern slavery risk, guided by the UN Guiding Principles on Business and Human Rights. In practice this means:

1. Identify – mapping where vulnerable workers may be exposed to risk across our operations and supply chain.
2. Evaluate – assessing the likelihood and severity of each risk against a consistent set of criteria so risks can be fairly compared and prioritised.
3. Respond – applying internal controls to prevent, detect and respond to modern slavery risk, with our policies alighted to the same framework for consistent application.

This statement was prepared in consultation with Procurement, Legal, People & Culture and Finance, as well as relevant contracted partners.

## Presence of Risks

Looking at where vulnerable workers may be exposed to exploitation across our operations, we've identified five settings that could carry potential risk. These are shaped by factors such as workforce composition, the nature of the work, geographical location, supplier relationships and labour sourcing practices. The table below maps each setting to its likely risk drivers and the controls we have in place.

Two controls apply across all Client-facing settings covered below: ongoing training for our people and active promotion of the Speaking Up and Whistleblower channels for anyone who needs to raise a concern. The table sets out what is additional or specific to each setting.

| Presence | Source of Risk | Mitigations and monitoring channels |
|---|---|---|
| Community | Lone workers, migrant labour, high casualisation, agency staff | Lone worker safety app on support worker phones<br>Quarterly Community Support Worker meetings<br>Annual staff engagement survey<br>Reporting and monitoring of agency providers |
| Lottery Home opens | Entry-level, temporary workforce | Lottery home opens supervised by MSWA staff<br>Campaigns are time bound |
| Residential and respite centres | Construction phases<br>Regular operations – migrant labour, high casualisation, agency staff | Reporting and monitoring of construction partners<br>Shift handovers with MSWA staff<br>Annual engagement surveys<br>Reporting and monitoring of agency providers |
| Service centres | Construction phases | Reporting and monitoring of construction partners |
| Contact centre | Entry-level, some temporary workforce | Co-located with administration offices and highly visible<br>Active recruitment from contract centre into support functions |

## Identifying risks

The table below applies our risk taxonomy across the entire supply chain to score each risk type by likelihood and impact (rated from 1, low, to 5, high) and flag its relevance to modern slavery.

| Category | Risk description | Likelihood* (1–5) | Impact (1–5) | Grading | Modern slavery relevance (yes, no or possible) | Modern slavery risk factor | Comments and mediations |
|---|---|---|---|---|---|---|---|
| Agency Workers | Care support workers engaged through third-party labour hire and workforce providers. | 4 | 4 | High | Yes | Labour hire; temporary/ casual workers; underpayment; weak visibility over employment terms. | Although some reliance on external care providers remains, MSWA manages the associated risks by reviewing agency contracts and confirming compliance with award wage requirements. Ongoing monitoring helps ensure that engaged agencies uphold fair employment practices. MSWA will require any future Agency providers to sign our Modern Slavery Questionnaire. |
| Major Construction Contracts | Engagement of contractors and subcontractors for construction projects. | 3 | 3 | Medium | Possible | Subcontractors; migrant/ temporary labour; labour-intensive trades; materials supply chains. | Appropriate checks are in place with our major contractor constructing the Montario Quarter Accommodation Facility in Shenton Park to assess ethical practices, including subcontractor engagement and payment compliance. Regular site inspections and engagement with subcontractors by the Head of Property Development and Construction help confirm that the contractor is not engaging in any unethical practices. To date, these regular site visits have not identified any evidence of modern slavery. |
| Online Marketplace/ Overseas Import | Procurement of goods from overseas suppliers and online marketplaces with limited visibility of upstream supply chains. | 4 | 3 | High | Yes | Opaque offshore sourcing; promotional merchandise/Craft materials; poor traceability. | Although the expenditure is not material, this remains a globally recognised high-risk channel. Where possible, MSWA will use local or verified suppliers and collect origin and compliance evidence for repeat purchases. |
| Information Technology | Use of technology vendors for software, hardware, cloud services and IT support. | 3 | 3 | Medium | Possible | Hardware/components; offshore support; electronics supply chains | MSWA currently does not actively outsource IT services offshore. Major providers such as Salesforce and Microsoft have established modern slavery compliance programs in place. Any vendors engaged in the future will need to demonstrate compliance with ethical sourcing standards or be assessed as presenting low jurisdictional risk. MSWA is also retiring its remaining legacy systems in favour of modern platforms, reducing residual risk and strengthening overall compliance. |
| Hospitality, Travel & Catering | Procurement of accommodation, travel, catering and hospitality-related services for staff, clients and events. | 3 | 2 | Medium | Possible | Casual/migrant labour; hotels, catering, and local cafes. | This is an indirect risk through service providers, low in materiality and infrequent in occurrence. MSWA manages it by using approved suppliers and applying questionnaires where risk thresholds are triggered. MSWA also has an approved corporate travel provider, which helps mitigate risk by ensuring we engage with compliant providers for regular travel bookings. |

**Likelihood ratings reflect the inherent risk profile of each category generally (sector and industry characteristics), not a confirmed finding about MSWA's current specific suppliers. They help guide and inform MSWA's due diligence.*

*Part four*

# Our current mitigations

## Due diligence and risk assessment

Protecting people from exploitation starts well before a concern is ever raised, which is why MSWA builds safeguards into the workplace itself across recruitment, onboarding, training, technology, remuneration and policy frameworks. Together, these measures work to reduce the risk of modern slavery and uphold the human rights of every employee.

- **Recruitment and selection process**
  Every candidate completes visa checks confirming their legal right to work in Australia, reducing the risk of undocumented or coerced employment. The mandatory NDIS Worker Screening Check adds a further layer of identity verification and background screening, lowering the likelihood of engaging someone with a history of exploitation. Before accepting an offer, every employee agrees to abide by MSWA's Code of Conduct.
- **Comprehensive onboarding and induction**
  Every new employee completes an orientation process that introduces MSWA's values, so all team members understand the behaviours and standards expected at MSWA. Frontline roles, including Support Workers, also complete our Foundations Program, with supervised 'buddy shifts' built in to ensure a practical, well-supported start. Both programs went through a thorough review in FY25-26 to keep them relevant to how we operate today.
- **Ongoing training and communication**
  MSWA holds regular Support Worker meetings, including sessions with executive representatives, to foster open dialogue, reinforce behaviour standards and create a consistent channel for updates and feedback. These meetings give employees a forum to raise concerns and help build a culture of transparency. Support Workers also receive refresher training at regular intervals, aligned to NDIS and Aged Care requirements, so they can provide the right level of care to our Clients and understand the professional boundaries that reduce the risk of exploitation in the community.
- **Technology-enabled safety and support**
  Community-based Support Workers carry mobile devices with safety and communication tools, helping them stay connected with supervisors and peers – including while working alone in Clients' homes. This year, employees were trained on lone worker safety applications and on using MS Teams to stay connected with their Team Leader and the scheduling team if issues arise while working in the community. A Copilot Agent, DMS Assistant, was added to Support Worker phones in FY25-26, giving them rapid access to policies and procedures via the Document Management System. MSWA also launched a new intranet, People Connect, in FY25-26 to strengthen connectivity across the organisation.
- **Regular remuneration monitoring**
  After the introduction of a new Remuneration Policy in FY24-25, annual remuneration reviews were conducted to verify that employees are compensated appropriately and in accordance with legal and organisational standards. In FY25-26, industry benchmarking was also introduced as part of the remuneration review, to ensure remuneration was not only aligned to MSWA's policies and legislation, but to the broader market.
- **Policy framework**
  MSWA is committed to a workplace free from discrimination and harassment, protecting the fundamental human rights of every person in our organisation. A suite of policies and procedures set clear standards of behaviour, complaint resolution processes and ongoing education, including the Equal Employment Opportunity Policy, the Respect@Work, Bullying and Harassment Policy, and the Diversity, Equity and Inclusion Policy. Through training, reporting mechanisms and regular policy review, we aim for every employee to feel respected in an inclusive culture where diversity is valued. MSWA also actively supports career progression, sharing open vacancies, training opportunities and interview tips, and celebrating team members taking on new challenges through our People Pulse newsletter.

## Grievance, reporting and remediation mechanisms

We give employees several ways to raise concerns and be heard. Regular contact between Support Workers and Team Leaders creates an everyday channel for two-way feedback, while our formal Whistleblower mechanism and internal Speak Up program let anyone confidentially report a suspected breach including anything related to modern slavery.



*Part five*

# Assessment of effectiveness

Oversight of MSWA's approach to modern slavery doesn't stop once mitigations are in place. The Modern Slavery Working Group meets quarterly to identify new or emerging risks and track progress against planned actions. That oversight is backed by data such as annual engagement surveys capturing employee feedback that feeds into our ongoing assessment of the workplace environment, potential risks and how well our initiatives are actually working. Additionally, reporting mechanisms are monitored on an ongoing basis to surface trends and opportunities for improvement.






*Part six*

# Update on Progress

## Progress against FY24-25 commitments

MSWA established the organisation wide remuneration framework, including external benchmarking in FY25-26.

Base contracts including modern slavery requirements were established and a new process whereby legal counsel engages in contract reviews was implemented.

A Modern Slavery policy was drafted and is currently undergoing review. The Bullying and Harassment Policy and the Diversity Equity and Inclusion Policy were also updated in FY25-26.

Modern Slavery training was also prepared and is currently in final stages of review before publication to all staff.

## Other progress in FY25-26

During FY26, MSWA commenced the rollout of an enhanced procurement framework, including updated Procurement Policy, Procurement Procedure and Delegations of Authority documents. These changes are designed to strengthen governance, improve accountability and ensure procurement decisions are supported by appropriate risk assessment and documentation requirements. Policy and procedures are in approval process at the time of publishing.

MSWA has introduced a Modern Slavery Supplier Questionnaire as part of its supplier due diligence framework. The questionnaire is now available for use and will be supported by purchaser training and awareness initiatives to ensure consistent application across the organisation. The questionnaire will assist MSWA in assessing supplier modern slavery risks, understanding supplier controls and identifying opportunities for further due diligence where required.

*Part Seven*

# Planned mitigations for FY26-27 and beyond

Looking ahead to FY26-27, our priority is to complete and embed the work already underway – publishing the Modern Slavery Policy, rolling out Modern Slavery training across the organisation, and deploying our new Human Capital Management (HCM) system to give us a single, holistic view of the employment lifecycle and strengthen ongoing risk monitoring.

We will also continue refreshing our internal policies and procedures, including our credit card usage policy, and progress further initiatives, such as a recruitment agency panel to strengthen oversight of labour hire and contractor arrangements.

MSWA continues to strengthen its approach to identifying, assessing and addressing modern slavery risks across its operations and supply chains through ongoing improvements to procurement governance, supplier due diligence, contract management and staff capability.

MSWA is also strengthening its contract management framework through updated supplier contract templates containing enhanced provisions relating to modern slavery, ethical sourcing, compliance obligations, audit rights and supplier notification requirements where material risks are identified.

Additional planned actions include:

- Rolling out procurement, contract management and delegation training across the organisation to improve awareness of procurement obligations, ethical sourcing requirements and approval responsibilities.
- Enhancing supplier due diligence processes for higher-risk suppliers and supplier categories.
- Increasing monitoring and review of labour hire, recruitment, construction, facilities, hospitality and other labour-intensive sectors.
- Strengthening controls around credit card purchasing, including restricting or discouraging purchases from identified higher-risk online marketplaces and overseas suppliers where appropriate procurement controls cannot be demonstrated.
- Expanding the use of preferred supplier arrangements to improve supplier oversight, consistency and compliance monitoring.
- Continuing periodic reviews of procurement policies, procedures, contract templates and governance frameworks to ensure alignment with evolving regulatory expectations and emerging modern slavery risks.

These initiatives support MSWA's commitment to continuous improvement and help ensure modern slavery considerations are embedded throughout supplier selection, procurement, contracting and supplier management activities.

This Modern Slavery Statement was approved by the Board of MSWA, in its capacity as the principal governing body of MSWA, on 21 October 2026.



Horst Bemmerl
*Chair*



MSWA Life not limits

MSWA Limited
ABN: 75 638 080 972
ACN: 670 532 224

Registered Office
154 Abernethy Road
Belmont WA 6104

(08) 6454 3222
mswa.org.au