



Life not limits

Modern Slavery
Statement
2024-2025



Acknowledgement of Country

In the spirit of reconciliation, MSWA acknowledges the Traditional Custodians of the many lands and language groups of Western Australia and their connections to land, sea and community. We pay our respect to their Elders past and present, and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

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From our CEO

Modern slavery is a serious global issue and MSWA is committed to playing our part in increasing awareness and reducing risks.

This reporting period (1 July 2024 - 30 June 2025), we've worked to identify and address risks within our organisation and supply chain to remain focused on continuous improvement. We are committed to transparency and are actively working to mitigate identified modern slavery risks.

Addressing modern slavery risks is a shared responsibility and every team member at MSWA has a role to play.

Thank you for your continued support as we work together to create safer, fairer and equitable systems.

Melanie Kiely
Chief Executive Officer

Part one About MSWA

MSWA is a leading disability provider for West Aussies living with neurological conditions, delivering wraparound support and services. In addition, to the provision of direct care services, MSWA also funds vital research into neurological conditions.

In 1972, a small group of people with multiple sclerosis (MS) formed The Multiple Sclerosis Society of Western Australia committed to helping others access information and support. More than five decades later, the society, now MSWA has a dedicated team that provides the best possible care across Western Australia.

Our purpose

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

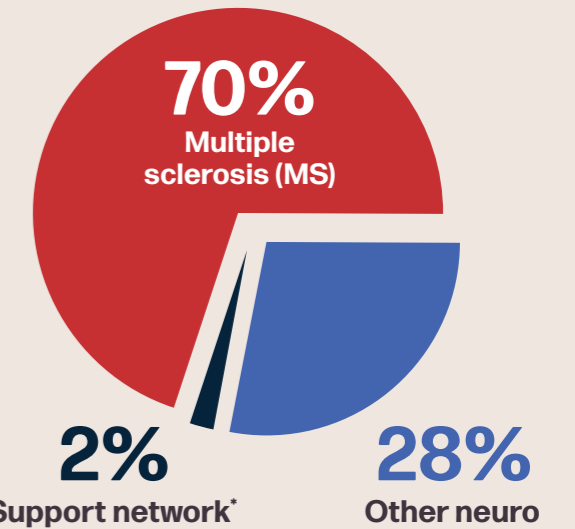
Our impact

Who we support

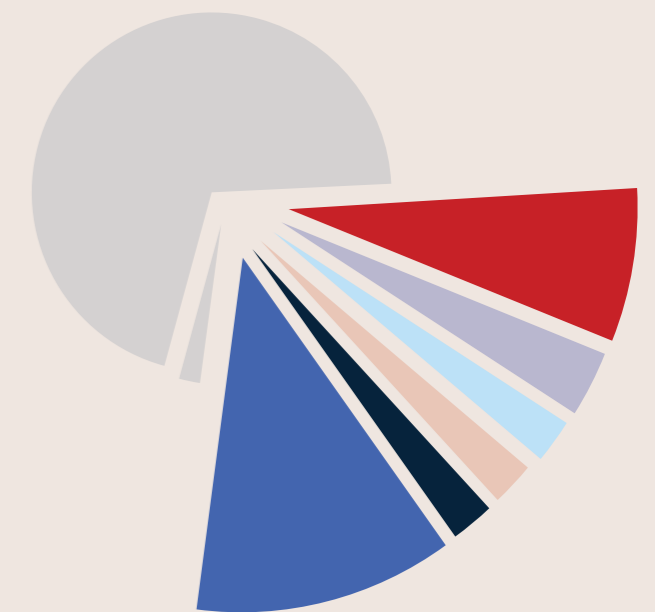
MSWA supports Western Australians living with a neurological condition including Clients who currently receive services or engage with MSWA through an MSWA facilitated program.

Recognising the vital role of support networks for individuals living with neurological conditions, MSWA also provides dedicated services to carers and family members.

Our Clients



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



Other neurological conditions

MSWA supports a range of neurological conditions including:

- Parkinson's disease 7%
- Stroke 3%
- Motor neuron disease 2%
- Acquired brain injury 2%
- Huntington's disease 2%
- Other neuro 12%

Our legal structure

MSWA is established as a not-for-profit organisation, operating as a company limited by guarantee under Australian law. MSWA did not own or control any other entities during the reporting period.

The legal structure ensures that MSWA is governed by a Board of Directors in line with the Constitution and that all funds and assets are applied solely to furthering the organisation's mission of supporting people living with neurological conditions.

This structure provides transparency and accountability, with profits reinvested into services, supports and research and no distribution to members or directors. It also guides how MSWA engages with suppliers, contractors and partners, ensuring ethical practices are embedded within operations and aligned with obligations under the Modern Slavery Act 2018 (Cth).

Our operations

MSWA key services, facilities and operations are located in Western Australia, predominantly across the metro area.



Support services

To meet the diverse needs of its Clients, MSWA offers nursing and allied health services such as counselling, dietetics, occupational therapy, physiotherapy, speech pathology and employment support.

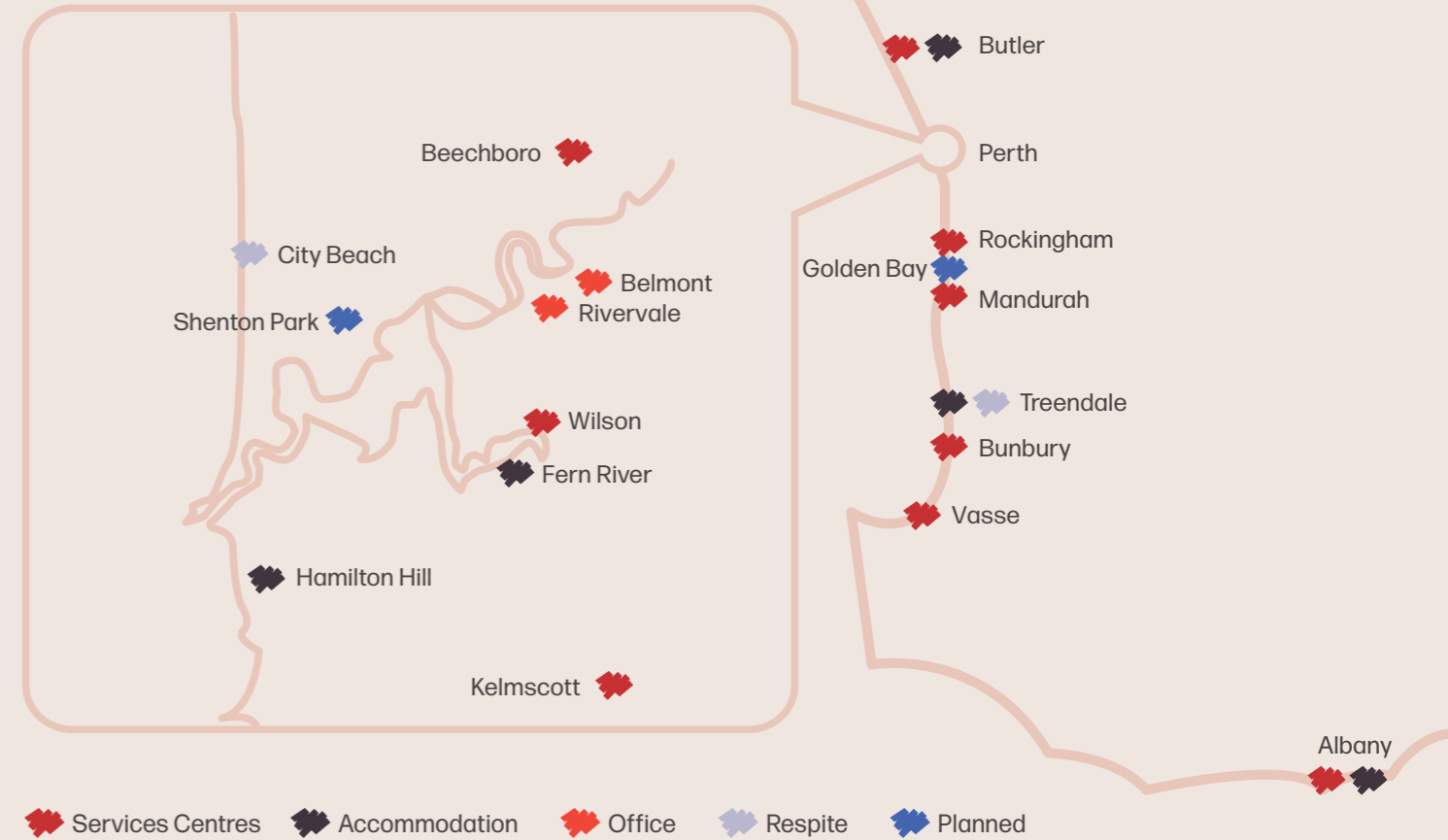
MSWA also empowers people living with neurological conditions to live independently through in-home care and high-support accommodation options.



Lotteries, events and fundraising

MSWA runs lotteries, raffles, events and fundraising initiatives, with all proceeds directly supporting the provisions of support services.

Our footprint



Part two

Supply chain and people

Our supply chain

During FY24-25, MSWA worked with 1,530 suppliers. Of these, seven suppliers account for spend over \$500K, ten suppliers fall within the \$100K - \$500K range and 930 suppliers have annual spend under \$1,000. Much of the supplier base is assessed as low risk for modern slavery, with only a small number identified as medium risk (two suppliers) or high risk (five suppliers). Many of MSWA's higher-spend suppliers are already compliant, with supporting documentation on file, and several are part of larger parent entities that have published modern slavery statements or reported compliance.

As part of our Client operations, we engage 399 suppliers, representing 12% of total expenses, with 34% of this spend directed towards agency workers; other key procurement areas include disability and mobility equipment, medical supplies and external brokerage. Our lotteries provide a range of prizes, including houses, cars, gift vouchers, holiday packages with flights and electrical and home appliances sourced from Retravision.

Our people

MSWA is proud to have over 810 employees contributing to the organisation's cause, including 234 new hires.

Employment at MSWA is distributed across various contract types, including 423 part-time, 223 full-time, 157 casual, eight fixed-term part-time and six fixed-term full-time positions.



Part three

Identifying and assessing modern slavery risks

MSWA Board responsibilities and governance

The MSWA Board has strategic oversight and responsibility for social risks impacting business operations, including modern slavery supply chain risks and human rights practices. The Board approves the vision, purpose and strategic direction of MSWA, setting risk appetites, monitoring its risk management framework and systems of internal controls. The Board fosters a culture of strong corporate responsibility, commitment to compliance, accountability and culture of respect for others.

Governance is established through comprehensive constitutional documents, and the Board Charter

and Delegation policies. This is further supported by both periodic internal and external audit programs to ensure compliance with regulatory and legislative reporting obligations. All audits are conducted as robust processes with key findings and recommendations reported to MSWA's relevant Board Committee.

The Board executes its duties with the support of various Board Subcommittees, comprised of members of the Board, external advisors and MSWA's Executive team. MSWA representatives from Finance, Procurement, Legal and People and Culture functions sit on the Modern Slavery Working Group, responsible for reviewing modern slavery risks and implementing appropriate mitigations strategies across all its operations.

Assessing risks

In alignment with the UN Guiding Principles on Business and Human Rights (UNGPs), MSWA assesses the severity of potential human rights impacts using defined consequence descriptors to ensure a consistent and meaningful evaluation of risk. MSWA's human rights taxonomy provides a structured framework for identifying and categorising risks across our operations and supply chains. These assessments are supported by a range of internal controls designed to prevent, detect and respond to modern slavery risks, ensuring that our practices uphold the dignity and rights of all individuals potentially affected by our business activities. This statement was prepared in consultation with internal functions including Procurement, Legal, People & Culture, and Finance, as well as relevant contracted partners.

Identifying risks

Category	Risk description	Likelihood (1-5)	Impact (1-5)	Modern slavery relevance (yes, no or possible)	Modern slavery risk factor	Comments and mediations
Internal labour and hospitality	Use of casual or part-time staff with variable hours and limited oversight.	3	3	Possible	Casual workers may be less aware of rights or less likely to report issues.	Most services are delivered by MSWA staff, who are paid award rates and operate under adequate working conditions. MSWA provides multiple touchpoints to gather staff feedback on the workplace experience and future service model. Recent employee engagement results have been positive and staff are encouraged to speak freely with their managers about any concerns.
Agency workers	Care support workers engaged through third-party labour hire services.	5	4	Yes	Limited control over employment terms and potential underpayment.	While some reliance on external care providers remains, MSWA mitigates associated risks by reviewing agency contracts and verifying compliance with award wage requirements. Ongoing monitoring ensures that agencies engaged uphold fair employment practices.
Construction and facilities	Engagement of subcontractors for building maintenance and facility upgrades.	3	4	Possible	Use of subcontracted migrant labour with potential oversight gaps.	Two major contractors - Devlyn Australia and Webb & Brown Neaves - are currently engaged by MSWA. Devlyn Australia is constructing the MSWA Shenton Park High-Support Accommodation and appropriate checks have been implemented to assess ethical practices, including subcontractor engagement and payment compliance. Evidence of modern slavery compliance has already been obtained from Webb & Brown Neaves.
Information technology	Use of offshore IT services and support providers.	3	3	Possible	Potential for poor working conditions in offshore environments.	MSWA does not currently outsource IT services. Our major overseas software providers, such as Salesforce and Microsoft, have established modern slavery compliance programs in place. For any future engagements, MSWA ensures that vendors either demonstrate compliance with ethical sourcing standards or present a low risk based on jurisdiction and vendor history. While some legacy systems remain, MSWA is actively retiring these and transitioning to modern platforms, reducing residual risks and strengthening overall compliance.
Other	Procurement of uniforms or promotional materials from overseas suppliers.	3	4	Yes	Apparel and textiles are globally recognised high-risk industries.	MSWA has updated procurement processes to address modern slavery risks in goods such as uniforms and promotional items. For suppliers with significant anticipated spend and no existing evidence of compliance, MSWA requires a completed questionnaire and/or signed declaration confirming awareness of modern slavery risks in their operations and supply chains. Our procurement team is responsible for managing this risk.



Part four

Our current mitigations

Due diligence and risk assessment

MSWA is committed to fostering a safe, ethical and inclusive workplace, implementing a range of measures across recruitment, onboarding, training, technology, remuneration and policy frameworks to reduce the risk of modern slavery and uphold the human rights of all employees.

- **Recruitment and selection process**
Candidates undergo visa checks to confirm their legal right to work in Australia mitigating the risk of undocumented or coerced employment. In addition, the mandatory NDIS Worker Screening Check requires comprehensive identity verification and background checks, reducing the likelihood of employing individuals with histories or risks of exploitation. To accept an employment offer, all employees must read and agree to abide by MSWA's Code of Conduct.
- **Comprehensive onboarding and induction**
All new employees undergo an orientation process, where they are introduced to organisational values to ensure all team members understand the behaviours and standards expected at MSWA. Frontline roles, including Support Workers, participate in a Foundations Program. Support Workers complete 'buddy shifts' as part of this program to ensure a practical and supported induction process.
- **Ongoing training and communication**
MSWA regularly conduct Support Worker meetings, including sessions with executive representatives, to foster open dialogue, reinforce awareness of behaviour standards and create a consistent channel for updates and feedback. These meetings enable employees to raise any concerns and encourage a culture of transparency.
- **Technology-enabled safety and support**
Community-based Support Workers are issued mobile devices with applications that enhance personal safety and facilitate real-time communication with supervisors and peers. Employees who work in Client's homes remain connected and supported, reducing vulnerabilities associated with working alone.

- **Regular remuneration monitoring**
To further safeguard against modern slavery risks and ensure fair treatment for all employees, MSWA has established a new Remuneration Policy. Remuneration reviews are conducted to verify that employees are compensated appropriately and in accordance with legal and organisational standards.
- **Policy framework**
MSWA is committed to maintaining a workplace that is free from discrimination and harassment, to protect the fundamental human rights of every individual within the organisation. A suite of policies and procedures provide guidance on expected standards of behaviour, complaint resolution processes and continuous education. These include, but are not limited to, the Equal Employment Opportunity Policy, the Workplace Discrimination and Harassment Policy and the Bullying Prevention Guidelines. Through training and reporting mechanisms, and ongoing review of these policies, MSWA aims for all employees to be treated with respect, fostering an inclusive culture where diversity is valued.

Grievance, reporting and remediation mechanisms

Regular interactions between Support Workers and Team Leaders provide an avenue for two-way communication, allowing any emerging issues or concerns to be identified and addressed.

MSWA offers multiple channels for raising concerns, including a formal Whistleblower mechanism and the internal Speak Up program, both of which enable employees to confidentially report any suspected breaches, including those related to modern slavery.

Part five

Assessment of effectiveness

To assess MSWA's progress, annual engagement surveys are conducted to capture feedback from employees, contributing to the ongoing assessment of the workplace environment, potential risks and the effectiveness of initiatives.

Reporting mechanisms are then monitored to identify trends and opportunities for improvement.



Part six

Planned mitigations for FY26 and beyond

Looking forward, MSWA will continue strengthening the approach to managing modern slavery risks through a comprehensive set of initiatives. These include the development of a dedicated Modern Slavery Policy, the introduction of new base contracts with modern slavery requirements and the establishment of an organisation-wide remuneration framework.

MSWA will also continue reviewing policies and procedures, including updates to the credit card usage policy and introduce new frameworks such as a recruitment agency panel and a uniform policy to enhance oversight and consistency.

To mitigate the risk of modern slavery within our operations and supply chains, we have implemented a suite of policies and procedures that guide ethical procurement and supplier engagement. These include our overarching Procurement Policy and Procedure, the Lotteries Home Prize Procurement Policy and a structured Preferred Supplier Selection Process.

Training and capacity building will be a focus across the organisation to increase awareness and capability in identifying and managing risks. The implementation of a new Human Capital Management (HCM) system will provide a holistic view of the employment lifecycle, further improving transparency and risk monitoring.

In addition, future Client contracts will be reviewed and updated to reflect modern slavery requirements, supported by strengthened monitoring and reporting mechanisms. These actions, alongside any other relevant measures identified through ongoing review, will support MSWA's commitment to continuous improvement in addressing modern slavery risks.





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