



Modern Slavery Statement

Year ending 31 December 2025



6 May 2026

Autism Spectrum Australia (Aspect) ABN 12 000 637 267 ('Aspect', 'we', 'us' or 'our').

Purpose of the Modern Slavery Statement

This Modern Slavery Statement is prepared in accordance with the Australian Modern Slavery Act 2018 (Cth) (Act). It outlines how Aspect identifies, mitigates and manages the risks of modern slavery within its operations and supply chains for the financial year ending 31 December 2025.

This statement outlines Aspect's ongoing commitment to upholding human rights and maintaining ethical standards across all areas of the organisation.

As one of Australia's leading providers of supports and services for people of all ages on the autism spectrum, we take seriously our responsibility to ensure that our operations and supply chains are free from practices that compromise human dignity. We also acknowledge that:

- forced labour and modern slavery practices unfortunately, potentially exist in the operations or supply chains of many businesses, in every region of the world; and
- addressing modern slavery is a complex, evolving process.

Aspect's approach to understanding and addressing modern slavery risk encompasses three key principles:

- **Accountability** – Aspect acknowledges its responsibility under the Act and understands that modern slavery may occur in our distributed direct business operations and indirectly in our supply chains and investment portfolios.
- **Transparency** – we are committed to being open and transparent with our stakeholders to outline Aspect's progress against this journey to end modern slavery.
- **Continuous improvement** – we are committed to the continuous improvement of our modern slavery risk assessment approach.

About Aspect

Established in 1966, Aspect is one of Australia's leading service providers for people on the autism spectrum. Aspect's specialised schools program is one of the largest in the world, with additional services that include diagnostic assessments, therapy, parent and family support, adult programs, information, training and advice. As a not-for-profit organisation, we work in partnership with people of all ages on the autism spectrum and their families to deliver evidence-informed services that are person centred, family focused and customer driven.

Aspect is committed to protecting the rights and interests of children and vulnerable people by providing them with a safe environment. This commitment extends to ensuring a culturally safe and inclusive environment that recognises and respects individuals' heritage, relationships and cultural practices.

We are committed to providing the best opportunities for people at home, in the classroom and at work. We are single-minded in our pursuit to make life better for people on the autism spectrum.

Our Structure and Governance

Aspect is a company limited by guarantee, duly registered under the Corporations Act 2001. It is a public benevolent institution with deductible gift recipient status as endorsed by the Australian Taxation Office (ATO) and registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC).

Our operations are entirely based in Australia. Aspect is a single business entity under the ABN 12 000 637 267 and does not operate or control any other business entities.

Aspect's board of directors (Board) exercises the powers vested in it by the Corporations Act 2001, Aspect's Constitution, Regulations and Board Charter. The Board oversees the strategic direction and key accountabilities of Aspect.

Operations and Workforce

The Chief Executive Officer (CEO) and the Executive team manage and coordinate the operations of the organisation. Aspect has offices in NSW, ACT, SA and VIC, and offers services across Australia. Our telehealth services operate via digital platforms and can be accessed from anywhere.

The two main activities of Aspect are outlined below:

1. **Education:** Aspect provides education to primary and secondary children at main campuses, satellite classes and via distance education.
2. **Individual and Community Services:** Aspect provides diagnostic assessments, therapy (including speech pathology, occupational therapy, positive behaviour support and psychology) and adult community services (designed for social integration and enabling participants to develop skills and gain confidence in community settings).

In addition to the above services, Aspect is also involved in:

- the building and provision of schools and classrooms;
- consulting to companies on how to make their workplaces more autism-friendly; and
- facilitating workshops, webinars and training sessions.

Aspect also delivers 'Positive Partnerships' which is a national project funded by the Australian Government Department of Education, Skills and Employment, that aims to support school aged children on the autism spectrum.

These offerings are supported by central activities including:

- Aspect Research Centre for Autism Practice;
- Fundraising activities; and
- Shared Services such as Finance, Information Technology (IT), Marketing and Human Resources.

Details on Aspect's workforce and participants (at 31 December 2025) are provided in the table below.

Size of Aspect's Operations	Number
# of schools	10
# of satellite classes	98
# of locations	73
# of students (main campus and satellite)	1,314
# of participants	2,384
# of full-time staff	420
# of part-time staff	691
# of casual staff	389
# of total staff	1,500
# of Full-time equivalents	1,237

Work to date to identify Modern Slavery Risk

Aspect continues to screen major suppliers (i.e. spending over \$250k) via self-assessment tools and/or third-party bureaus such as:

- Buy.NSW for the procurement of technology services and products; and
- the CM3 contractor prequalification system across property and construction activities.

In addition, Aspect has added modern slavery clauses to contract templates and embedded a contractor handbook as part of onboarding suppliers that includes expectations in relation to conduct of suppliers.

Risk Assessment Approach

In 2025, our strategy for managing modern slavery risks focused on gathering information on our direct operations (i.e. schools and assessment centres) and from our direct supply chain. Both the direct operations and the direct supply chain were assessed for the risk of modern slavery by geography and industry.

We acknowledge that issues of modern slavery risk are highly complex and not always able to be identified. We rely primarily on data from third-party providers and understand that this data may be incomplete.

Risk Assessment Outcomes

Risks in our operations and workforce

Aspect operates entirely within Australia, and all employees and casual staff are based in Australia. As Australia has robust employment laws and given that Aspect is also required to comply with strict regulations in place for the education and disability sectors, we believe there is very low risk of Aspect being the cause of modern slavery in our workforce.

Aspect also assessed that there is very low risk of causing or contributing to modern slavery practices for our students on work experience placements or internships with other companies. Aspect has both internal and external guidelines for curriculum, insurance and screening requirements for placements, as well as individual goals matching each student to their placement.

Aspect has independently operated whistleblowing arrangements in place that allow employees and third parties to anonymously report any concerns regarding unethical or illegal conduct, including in relation to modern slavery. Aspect's Whistleblower Policy is supported by whistleblower training which is part of the induction program for all Aspect's employees and casual staff.

Aspect has not received any complaints in relation to modern slavery since the inception of our whistleblower program in 2019.

Conclusion

Overall, given that we operate entirely within Australia, the risk of modern slavery within internal operations is assessed as low.

Risks in our direct supply chains

Summary of suppliers

Approximately 73.5% of Aspect's spending in 2025 was on salaries/wages for full-time, part-time, casual and temporary staff, with the balance (26.5%) spent on supplies and services.

Spend	Proportion of Spending (%)
Supplies and services	26.5
Salaries	73.5

Aspect has a highly distributed business model that operates across 73 locations. Each of these locations can engage multiple local suppliers with small spending. We believe that this decentralised and diverse procurement model presents the greatest potential linkage to modern slavery risks for Aspect.

For 2025, Aspect had 1,730 suppliers, however only 24 of these suppliers were considered major suppliers. Of the 1,730 suppliers, 91 of them (or 5.3% by number) are managed centrally through the Aspect's national office. These 91 suppliers represent almost 37% of the expenditure on all suppliers.

Suppliers by geography

For 2025, analysis was undertaken to understand the modern slavery risk by country within our direct supply chain. We based this assessment on research by Walk Free¹, an international human rights group based in Perth, Western Australia. The work by Walk Free has estimated the prevalence of modern slavery per 1,000 (Prevalence Estimate) by country.

Around 99% of Aspect's direct suppliers (by spend and number) are either headquartered in Australia or have an Australian subsidiary/presence. The remaining 1% do not have a local presence.

Aspect does have one direct supplier (0.5% of total supplier spend) that has operations based in India, where the Prevalence Estimate is 8.01. This supplier is a technology company that provides services, tools and Customer Relationship Management solutions and does not manufacture technology hardware. The remaining suppliers were found to operate in lower risk geographies, namely USA, Singapore, Canada and Germany.

On that basis, Aspect does not have any high-risk direct suppliers on a geographic basis.

Suppliers by industry

The table below shows the proportion of spending on suppliers by industry.

Industry	Proportion of Spending (%)
Employee-related expenses (e.g. salary packaging suppliers)	30
Information media and telecommunications	23
Professional, scientific, technical services	17
Retail and wholesale trade industry	8
Administrative and support services	4
Transport, postal and warehousing	4
Financial and insurance services	4
Rental, hiring and real estate services	5
Accommodation and food services	3
Education and training	2
Electricity, gas, water, waste services	1
Arts and recreation	0

Aspect has compared the spend with direct suppliers in different categories against high-risk products/industries. To do this Aspect used Walk Free's list of products at risk of modern slavery² which are summarised as:

- Agricultural products & services (e.g. coffee) and Forest products (e.g. timber);
- Electronics - Technology Hardware, Storage & Peripherals;
- Packaged Foods & Meats;
- Health Care Equipment;
- Gold and precious metals & minerals (e.g. diamonds);
- Building Products (e.g. Bricks, solar panels) and Home Furnishings (e.g. carpets);
- Apparel, Accessories & Luxury Goods and Textiles; and
- Coal & Consumable Fuels.

The analysis shows that spend on technology related services (about 6% of total spend) is likely to represent the highest risk of modern slavery in Aspect's direct supply chain.

¹ <https://www.walkfree.org/>

² <https://www.walkfree.org/global-slavery-index/methodology/methodology-content/#g20-imports> (table 17)

Conclusion

Overall, based on this analysis of both geographic and sector exposure, we believe Aspect's direct supply chain delivers a low to medium risk for modern slavery overall.

Approach to Remediation

Aspect has a multi-layered approach to remediation as outlined below, centered on both supporting affected individuals and addressing root causes to prevent recurrence.

Accessible grievance and reporting mechanisms

At Aspect processes are in place for reporting complaints and employee grievances — including our Feedback and Complaints Management Procedure, Qualifying Disclosures (Whistleblowing) Procedure, and Managing Employee Grievances Procedure. These provide pathways for individuals, including employees, suppliers, and other stakeholders, to raise concerns confidentially and safely. Where modern slavery or related risks are identified through these channels, Aspect will take appropriate action to investigate and, where necessary, escalate issues for remediation.

Corrective action and supplier engagement

In cases where a supplier is found to be contributing to (or directly linked to) modern slavery risks, Aspect will, wherever possible, seek to work with the supplier to implement a corrective action plan. This may include requiring changes to their operations, labour practices, or subcontracting arrangements.

Contractual safeguards and escalation

Where a supplier fails to cooperate with screening requirements or requests for further information — particularly in relation to modern slavery risks — Aspect reserves the right to not engage or to terminate existing contracts, in accordance with the standard modern slavery clause included in agreements. While this action is a last resort, it is a necessary escalation pathway to mitigate ongoing risk and uphold our ethical standards.

Action Plan

Aspect is committed to embedding modern slavery risk management into everyday operations. Our focus in 2026 will be to:

- update the Ethical Business Conduct Policy and Contractor Management Procedure to further embed controls to prevent the risk of modern slavery;
- review all major suppliers to determine if they have a modern slavery policy, modern slavery statement or have been approved by a reputable screening service;
- review all contracts with major supplier to ensure they contain the standard modern slavery clause; and
- review the investment guidelines with our Investment Advisers to improve controls around the risk of modern slavery in our investment portfolios.

Measuring the effectiveness of our risk assessment and actions taken

Aspect has systems in place to manage the risk of modern slavery in its operations and supply chains. In 2026 Aspect will develop a more comprehensive framework to measure the ongoing effectiveness of our risk assessment. The framework is likely to include measures such as:

- the percentage of major suppliers that have a modern slavery policy;
- the percentage of major suppliers that have a modern slavery statement;
- the percentage of contracts with major suppliers that have modern slavery clauses; and
- the percentage of major suppliers that are approved by a reputable screening service.

This Modern Slavery Statement has been endorsed by the Board of Autism Spectrum Australia.

Signed by

A handwritten signature in black ink that reads "Jacqui Borland". The script is cursive and fluid.

Chief Executive Officer
Jacqui Borland

A handwritten signature in black ink that reads "PKhoury". The initials "PK" are prominent and stylized.

Chair of the Aspect Board
Paul Khoury

6 May 2026