



Modern Slavery Statement

2024

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Message from our CEO

I am proud to present Aspect’s fifth Modern Slavery Statement, covering the reporting period ending 31 December 2024. This statement outlines our ongoing commitment to upholding human rights and maintaining ethical standards across all areas of our 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 acknowledge that addressing modern slavery is a complex, evolving process. In the year ahead, our focus will remain on continuous improvement—strengthening our policies, deepening engagement with stakeholders, and fostering a culture of accountability.

Together with our staff, partners, and the wider community, we remain committed to promoting respect, safety, and freedom from exploitation for all individuals.

Jacqui Borland

Chief Executive Officer
Jacqui Borland
Aspect

About Aspect



Aspect is one of Australia’s leading service providers for people on the autism spectrum.

Our 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 a child safe organisation 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.

Our structure

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.

Our operations

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 and we are devoted to making connections that help us to better understand people’s needs and wants.

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.



of schools and satellite classes

10 schools
>100 satellites



of locations

79



of students
(main campus and satellite)

1,260



of participants

2,731



of staff

1,458

The principle activities of Aspect are to provide person-centred, family-focused and customer-driven services to children, young people and adults on the autism spectrum.

Education	Individual & Community Services	Capacity Building
<ul style="list-style-type: none">PrimarySecondaryMain campusSatellite classDistance education.	<ul style="list-style-type: none">Diagnostic assessmentsTherapy (including speech pathology, occupational therapy and psychology)Adult Community Services.	<ul style="list-style-type: none">Capacity buildingAutism Friendly consultingWorkshops and webinarsTraining.
Shared Services		
<p>Aspect Research Centre for Autism Practice (ARCAP)</p> <p>Fundraising</p> <p>Shared Services (Finance, IT, Marketing, People,Culture and Safety)</p>		
Positive Partnerships		
<p>A national project funded by the Australian Government Department of Education, Skills and Employment, through the Helping Children with Autism program, that aims to support school aged children on the autism spectrum.</p>		



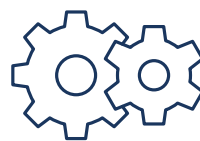
Our assessment of current modern slavery risks in our operations and supply chains

Our supply chains



of suppliers

2,385



% of organisational spending on supplies and services

21.29%



% of suppliers based in Australia

97.99%



% of suppliers managed centrally through our National Office business units

3.86%

% of spending per industry type



Information media and telecommunications	30%
Professional, scientific, technical services	22%
Retail and wholesale trade industry	10%
Administrative and support services	7%
Employee expenses and others	7%
Transport, postal and warehousing	6%
Financial and insurance services	6%
Rental, hiring and real estate services	5%
Accommodation and food services	4 %
Education and training	2%
Electricity, gas, water, waste services	1%
Arts and recreation	0%

Cause modern slavery – no risk

Due to the strict regulations in the education and disability sectors in which we operate and the employment laws that Aspect is required to comply with, for all paid and voluntary staff, we believe there is no risk of Aspect being the cause of modern slavery in our workforce.

Aspect also assessed that there is no risk of causing or contributing to modern slavery practices for our students on work experience placements or internships. 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.

Contribute to modern slavery – low risk

Aspect has determined it has a low risk of contributing to modern slavery, with a number of protective factors in place. Aspect has only a very small percentage of regularly contracted or agency workforce for day-to-day operations. Temporary staff are used infrequently in the event there is a vacancy in a range of administrative positions across the organisation. Within Aspect's time-limited project work, there is a high amount of contracted staff performing work in a variety of industries including:

- Construction
- Fundraising services (telemarketing, face-to-face, direct mail, advertising, media, digital support)
- IT software development and programming
- Professional services (including financial services, audits, expert consultancies, legal)
- Marketing, media and design
- Strategy development
- Facilities maintenance and hygiene services
- Recruitment and pre-employment screening
- Resource development and printing
- Language translation, interpreters and transcriptions
- Research.

Contracted and agency staff, when used, are mostly based in Australia and therefore are subject to Australian employment laws.



Link to modern slavery – high risk

Over the past two years, Aspect has demonstrated a sustained commitment to continuous improvement in modern slavery risk mitigation. A key focus has been on strengthening procurement practices, following the identification that our decentralised and diverse procurement model presented the greatest potential linkage to modern slavery risks. In response, Aspect commenced a centralisation initiative in 2022 to improve oversight and control, particularly in high-risk industries or areas of significant organisational spend. This work progressed throughout 2024, in accordance with the standard modern slavery clause included in all agreements since the introduction of the Modern Slavery Act. The Contract Management Procedure is currently under review to formally embed this clause and align procurement governance with our ethical sourcing commitments.

This year, our assessment of suppliers included those that were accessed by staff and paid by Aspect.

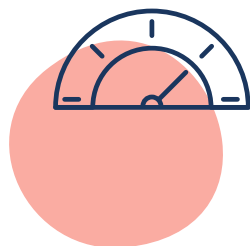
The result identified that Aspect:

- still has a largely decentralised and diverse procurement process with a significant number of suppliers being low spend, local providers and managed by local business units
- increased the number of suppliers managed centrally by Aspect National Office from 3.59% in 2023 to 3.86% in 2024
- predominantly utilises Australian suppliers, with 97.99% of major suppliers being based in Australia. All of the remaining suppliers (2.01%) are in countries towards the lower end of risk of modern slavery – USA, Ireland, Germany, Canada, UK, Japan, Singapore and the Netherlands – although Aspect recognises this does not mean that our suppliers are free of modern slavery.

Aspect has classified its supply chain and operational spending according to modern slavery risk exposure. The table below outlines categories assessed as high, moderate or low risk based on factors such as industry profile, supplier location and procurement model.



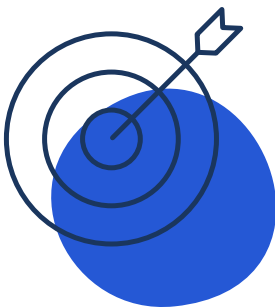
Actions to assess and address our modern slavery risks



Linked areas of high risk	Linked areas of moderate risk	Linked areas of low risk
<ul style="list-style-type: none">• Branded and unbranded goods not for resale (marketing, merchandise and in-house use)• ICT hardware, software and telecommunications• Vehicle leasing/fleet care• Construction and construction supplies• Use of travel and accommodation services• Facilities management (cleaning, gardening, security, maintenance)• Hire and purchase of facilities and property for schools and service provision• Some external organisation partnerships that involve some high-risk industries.	<ul style="list-style-type: none">• Procurement of insurances and investments• Postal and courier services• Personal protective equipment (PPE) and cleaning supplies• Furniture, stationery and office supplies• Low-cost items (sensory aids, play equipment and teaching resources)• Clothing and uniforms• Diverse and ad hoc spending in retail stores• Some external organisation partnerships that involve some moderate-risk industries.	<ul style="list-style-type: none">• Hire and purchase of resources, training and commercial/community services• Paid marketing in print or online• Digital and data services• Professional services and resource development• Procurement of licensed products (assessment tools, apps)• Receipt of gifts, in-kind services and donations• Some external organisation partnerships that involve some low-risk industries.

Supplier risk identification and screening

- Mapped all major suppliers at a high-level through review of 2024 invoices and expenditure
- Screened all major suppliers via self-assessment tools and third-party bureaus
- Communicated to relevant Australian based suppliers about modern slavery risks to better understand the challenges they face
- Continued to risk assess suppliers who are due for contract renewal or tender in 2025
- Commenced mapping Tier Two supplier relationships for high-risk categories, laying the groundwork for deeper supplier chain transparency beyond major suppliers.



Organisational awareness and capacity building

- Continued to raise awareness internally including ongoing access to online training resources
- Reviewed learnings from Aspect's 2023 Statement with Aspect's Executive team for the prioritisation of continuous improvement actions
- Ongoing tracking of corporate risk of "Failure to address the risk of modern slavery practices" at Executive and Board level.

Strategic supplier oversight

- Improved oversight of high-spend suppliers by centrally managing those in high-risk industries directly engaged by Aspect.

Procurement governance and systems integration

- Refined the pre-approved/preferred supplier approach across key operational areas – work health and safety, property and high-expenditure categories – to strengthen procurement consistency, oversight and risk mitigation
- Progressed the rollout of a contractor management system under Aspect's Capital Master Plan to standardise contractor onboarding and prequalification, while strengthening alignment with work health and safety, modern slavery risk management, and supplier governance through integrated screening and compliance checks
- Enhanced alignment of procurement practices with both work health and safety requirements and modern slavery risk management
- Initiated alignment of procurement documentation and workflows (e.g. tender templates, contract clauses, evaluation criteria) to embed human rights due diligence and supplier ethical compliance into standard practice
- Continued inclusion of the standard modern slavery clause included in all agreements since the introduction of the Modern Slavery Act (organisations with the revenue >\$100 mil).

Audit, governance and policy development

- Strengthened project governance in the Capital Works Program by embedding consistent processes and completing an internal audit to identify improvement opportunities
- Completed a Procure to Pay internal audit focused on invoicing and approvals
- Identified a number of initiatives to close gaps and mitigate procurement risks across the asset management lifecycle based on the Asset Management Improvement Plan (2023–2026)
- Implemented an Asset Management policy (aligned to ISO 5500:2014) to provide a framework for the development and management of Aspect assets
- Implemented an Information Security policy (aligned to ISO 27001:2022) to ensure a consistent approach to Information Security across the organisation.

Actions to assess and address our modern slavery risks

Remediation

Aspect is committed to taking meaningful and effective action to remediate any adverse human rights impacts, including modern slavery, identified within our operations or supply chains. Our approach to remediation is centred on both supporting affected individuals and addressing root causes to prevent recurrence.

- Accessible grievance and reporting mechanisms

Aspect has established and accessible processes in place—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 with 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 all agreements since the introduction of the Modern Slavery Act. While this action is a last resort, it is a necessary escalation pathway to mitigate ongoing risk and uphold our ethical standards. Where such action is taken, Aspect will assess the potential for adverse impacts on affected workers and, where appropriate, take further steps to minimise harm.

Through this multi-layered approach, Aspect seeks not only to meet legal and ethical obligations but to uphold the dignity, rights, and wellbeing of individuals in our sphere of influence.



Measuring the effectiveness of our risk assessment and actions taken

Aspect measures the effectiveness of our risk assessment and actions taken in relation to modern slavery through the following actions:

- Ongoing review of our corporate risk on modern slavery by the Aspect Executive team which is reported to the Finance, Audit and Risk Committee of the Board and includes a review of progress against actions associated with the risk
- Screening for all major suppliers via self-assessment and third-party tools
- Embedding a modern slavery clause in all new contractor agreements with organisations subject to reporting under the Modern Slavery Act
- Managing expectations around ethical sourcing and human rights through our Supplier Code of Conduct
- Aligning Asset Management Policy with ISO 55001:2014 to improve asset lifecycle governance and procurement risk controls
- Effective contractor management through the CM3 contractor prequalification system across property and construction activities (Capital Master Plan)
- Integration of modern slavery obligations and standard clause requirements in the Contract Management Procedure
- Expanding supplier mapping and extended risk visibility in high expenditure categories on Tier 2 (non-major) suppliers.



Our ongoing commitment to managing the risk of modern slavery practices

Aspect is committed to embedding modern slavery risk management into everyday operations. Over the coming year, we will continue working with suppliers to ensure compliance with laws and standards, while strengthening procurement policies, processes, and training.

We will regularly review supplier relationships to identify risks and monitor the corporate risk of modern slavery with Executive and Board oversight.

Although we may have limited influence on large suppliers, we are committed to strong governance and doing what we can to meet our obligations.

Aspect upholds human rights and rejects all forms of slavery. We are committed to continuous improvement in identifying and addressing risks across our operations and supply chains.



Signed by

Chief Executive Officer
Jacqui Borland

11 June 2025

Chair of the Aspect Board
Paul Khoury

11 June 2025