

**MDA National Limited and MDA National  
Insurance Pty Limited  
Modern Slavery Policy**

Effective 21/11/2024

# 1 Document Control

Owner	Executive Manager Corporate Services
Maintained by	TBD
Review Schedule	Every two years
Softcopy Location	\\MDA-WA\Corpsec\Policies & Procedures\Modern Slavery Policy
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## 1.1 Document Versioning

Version	Date	Updates	Author
1.0	21 November 2024	MDA National Group reported consolidated revenue in excess of \$100m as at 30 June 2024 and is now required to comply with the Modern Slavery Act 2018(Cth). The Act requires Australian entities to report on how we are preventing and addressing modern slavery risks in our operations and supply chains.	EMCS

## 1.2 Approvals

Title/Role	Name	Version	Date
MDA National Limited Board		1.0	
MDA National Insurance Pty Ltd Board		1.0	

## 1.3 Distribution

Title	Version	Date of Issue
MDAN & MDANI Boards & All Staff	V1.0	

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## 2 Introduction

Effective 1 July 2024, the MDA National Group is required to comply with the Modern Slavery Act 2018 (Cth) which applies to all Australian entities who report a combined minimum revenue of \$100m. This document sets out the MDA National Group's policy on Modern Slavery.

### 2.1 Purpose

The Modern Slavery Act 2018 (Cth) (The Act) came into force on 1 January 2019 and the purpose of the Act is to create awareness amongst Australian companies that modern slavery practices could be occurring in their supply chains or businesses either here in Australia or elsewhere in the world where there are potentially millions who are subjected to modern slavery.

The Act defines 'modern slavery' with reference to the Commonwealth Criminal Code and international law and captures:

- Conduct that would constitute slavery and slavery-like offences, whether or not the conduct took place in Australia;
- Human trafficking and
- Child labour

Slavery and slavery-like conduct would include forced labour, deceptive recruitment and debt bondage.

This document sets out the policy of the MDA National group of companies to ensure compliance with The Act and demonstrates our commitment to addressing modern slavery in all its forms and promotes awareness of concerns relating to modern slavery amongst our employees, contractors and suppliers.

### 2.2 Scope

The scope of this policy covers both entities, MDA National Limited (Mutual) and its wholly owned subsidiary, MDA National Insurance Pty Ltd (MDANI), the consolidated revenues which exceeds \$100m.

The policy applies to all directors, officers, employees, contractors and suppliers of the MDA National Group.

The MDA National Group has a no tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

## 3 Roles and Responsibilities

### 3.1 Mutual & MDANI Boards

The Board of Directors of the Mutual and MDANI have overall responsibility for this policy and for ensuring that the companies comply with all its legal and ethical obligations. Approval is therefore vested with the Boards.

Each year, all reporting entities are required to submit a 'Modern Slavery Statement' to the Minister of Home Affairs through a public registry. The statement must describe the risks in relation to modern slavery that exist in our operations and supply chains and actions that are being taken to mitigate the risks. This statement must be given to the Minister within 6 months after the end of the MDA National's financial year end, which is the 31 December each year, commencing from 2024.

Section 14 of The Act permits one annual statement to be submitted for each group of reporting entities. Hence MDA National Limited will submit one statement, each year, on behalf of the Group. This is done in consultation with MDANI and with the approval of the Board of Directors of MDANI.

The Chair of the Mutual Board and Chief Executive Officer (CEO) of MDANI are responsible for signing the annual statement.

### **3.2 Chief Executive Officer**

The CEO of both entities has the primary day-to-day responsibility for the implementation of this policy, monitoring its application and ensuring that appropriate processes and control systems are in place to ensure compliance with The Act.

### **3.3 Executive Manager Corporate Services (EMCS)**

The EMCS is responsible for review and updating of the policy.

Contract owners and staff who have responsibility for procurement of goods and services, must liaise with the EMCS to ensure that appropriate contract clauses are in place to ensure that suppliers comply with The Act.

### **3.4 All staff**

All staff are responsible for following the policy to the extent that it affects their day-to-day works and in respect of the reporting requirements. Should staff have any concerns, they should raise their concerns to the People & Culture team or their manager.

## **4 Approach to meeting our obligations**

We aim to implement the following measures to address our obligations to eradicate modern slavery:

- Adopt a risk-based approach focusing our efforts on our high-risk suppliers
- Ensure that compliance with the Modern Slavery Act 2018(Cth) is required of all our material and high-risk suppliers by having adherence to the obligation written in all these contracts.
- Wherever practical , to engage suppliers who are Australian domiciled and have operations and staff employed here in Australia where there is an obligation to comply with The Act.
- Implement a process of continuous review for compliance by our material and high-risk vendors as part of our supplier due diligence process.

## **5 Review**

The Modern Slavery Policy is reviewed by the Boards at least once every two years.

## 6 Related Policies

- Whistleblower Protection Policy
- Code of Conduct
- Workplace Behaviour Policy & Procedures
- Procurement Policy