

Modern Slavery Statement

SAMPLE

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Purpose and Scope

This Modern Slavery Statement sets out how [Company Name] identifies, assesses, and manages the risks of modern slavery within its operations and supply chains. It is designed to meet the requirements of the Modern Slavery Act 2018 (Cth) and align with [Company Name]'s broader work health and safety (WHS) obligations under relevant Australian WHS legislation.

Modern slavery is fundamentally incompatible with safe, healthy and decent work. This Statement integrates WHS risk management principles with ethical sourcing and labour practices, particularly across the Retail and Wholesale, Manufacturing and Production, Mining and Resources, and Building and Construction sectors in which [Company Name] operates or sources goods and services.

This Statement applies to:

- All business units, controlled entities and joint ventures where [Company Name] has management influence.
- All officers, workers, contractors, labour hire workers, and volunteers engaged by [Company Name].
- All tiers of the supply chain, including raw materials, components, finished goods, logistics, and service providers.

Definitions

Modern Slavery

For the purposes of this Statement, modern slavery includes conduct defined in the Modern Slavery Act 2018 (Cth), such as:

- Trafficking in persons
- Slavery and practices similar to slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage
- The worst forms of child labour
- Deceptive recruiting for labour or services

Related WHS and Employment Concepts

- **Worker:** Any person who carries out work in any capacity for [Company Name], including employees, contractors, subcontractors, labour hire workers, apprentices, trainees, and volunteers.
- **PCBU:** Person Conducting a Business or Undertaking, as defined in WHS legislation. [Company Name] is a PCBU and has primary duties of care for workers' health and safety.

- **Due Diligence:** The process by which [Company Name] identifies, prevents, mitigates, and accounts for how it addresses actual and potential modern slavery risks, integrated with WHS risk management.

Organisational Context and Structure

Business Profile

[Company Name] operates in and/or supplies to the following sectors:

- Retail and Wholesale (e.g. consumer goods, hardware, apparel, food and beverage)
- Manufacturing and Production (e.g. components, packaging, fabricated products)
- Mining and Resources (e.g. extraction, processing, maintenance services)
- Building and Construction (e.g. materials, subcontracted trades, plant hire)

Operations may include warehousing and distribution, production facilities, project sites, field operations, and corporate offices across Australian states and territories. Some supply chains extend into high risk regions and areas for raw materials, components, garments, electronics, construction materials and processed minerals.

Governance and Accountability

Modern slavery risk management is integrated into [Company Name]'s WHS and corporate governance frameworks as follows:

- The Board (or equivalent governing body) approves this Modern Slavery Statement and oversees implementation.
- The Executive Team is accountable for ensuring adequate resources, systems and controls are in place.
- The WHS, Procurement, HR and Legal/Compliance functions jointly own the modern slavery risk program.
- Line managers and supervisors are responsible for implementing controls at site and project level.
- Workers are required to comply with policies, report concerns, and participate in training.

Policy Framework

Modern Slavery and Human Rights Policy

[Company Name] maintains a Modern Slavery and Human Rights Policy that:

- Prohibits all forms of modern slavery in operations and supply chains.
- Commits to respecting internationally recognised human rights and labour standards.
- Requires suppliers and contractors to uphold equivalent standards.

- Links modern slavery controls with WHS risk management, incident reporting, and contractor management processes.

Supporting WHS and Employment Policies

This Statement should be read in conjunction with the following key documents:

- WHS Policy
- Code of Conduct
- Procurement and Supplier Management Policy
- Contractor and Labour Hire Management Procedures
- Grievance and Whistleblower Policies
- Anti-Discrimination, Bullying and Harassment Policies
- Fitness for Work and Fatigue Management Procedures

These policies collectively support safe, healthy and fair working conditions and help identify indicators of modern slavery such as excessive working hours, unsafe accommodation, or restrictions on freedom of movement.

Modern Slavery Risk Identification

Risk Context and Sector

Modern slavery risks vary across [Company Name]'s operations and supply chains:

- **Retail and Wholesale:** Risks in apparel, footwear, electronics, food and homewares sourced from overseas factories, farms, and fisheries. High-risk indicators include low-cost goods, complex multi-tier supply chains, and seasonal or piece-rate work.
- **Manufacturing and Production:** Risks in subcontracted manufacturing, packaging, and cleaning services, particularly where migrant workers or labour hire arrangements are used.
- **Mining and Resources:** Risks in outsourced services (camp management, catering, cleaning, security), raw material extraction in high-risk countries, and long labour supply chains for specialised equipment.
- **Building and Construction:** Risks in subcontracted trades, labour hire, prefabricated components, stone and tiles, steel, and temporary migrant workers on large projects.

Risk Factors and Indicators

Risk assessment considers the following factors:

- Country and regional risk (governance, rule of law, labour protections)
- Sector and industry risk (known prevalence of modern slavery)
- Product and service risk (e.g. garments, electronics, construction materials, raw minerals)