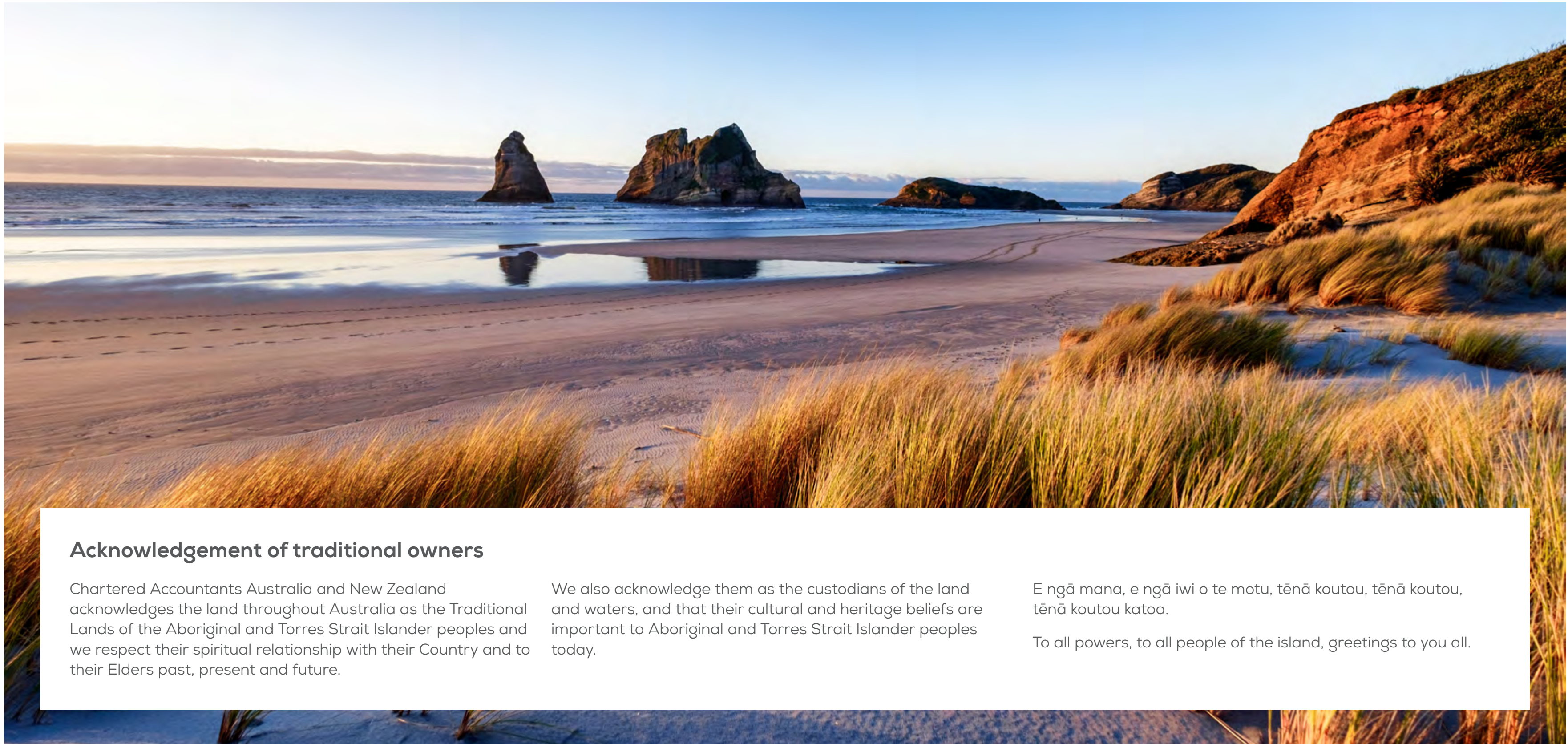


Modern slavery and human trafficking statement 2022



Acknowledgement of traditional owners

Chartered Accountants Australia and New Zealand acknowledges the land throughout Australia as the Traditional Lands of the Aboriginal and Torres Strait Islander peoples and we respect their spiritual relationship with their Country and to their Elders past, present and future.

We also acknowledge them as the custodians of the land and waters, and that their cultural and heritage beliefs are important to Aboriginal and Torres Strait Islander peoples today.

E ngā mana, e ngā iwi o te motu, tēnā koutou, tēnā koutou, tēnā koutou katoa.

To all powers, to all people of the island, greetings to you all.



Note from Chair & CEO

Through regular interaction with our members and their broader communities, Chartered Accountants Australia New Zealand (CA ANZ) influences thousands of organisations to pay attention to issues that affect the way they do business – not just in Australia and New Zealand, but worldwide.

Modern slavery is no exception. The exploitation of people through coercion, threats or deception to undermine or deprive them of their freedom is abhorrent. Yet it is estimated to affect about 45 million people worldwide and can occur in any sector, industry or country.

Eradicating modern slavery and human trafficking remains part of CA ANZ’s advocacy. We seek to influence relevant standards, legislation and policy decisions in the public interest and for the social good of communities.

In New Zealand, we responded to the Ministry of Business, Innovation and Employment’s consultation on modern slavery and worker exploitation in June 2022. We also facilitated an event in September 2021 to share knowledge on the issue.

Australia’s Modern Slavery Act 2018 (Cth) requires Australian and Australia-based organisations with

more than AUD\$100 million in annual revenue to report on the risks of modern slavery in their operations and supply chains and actions taken to address those risks.

We welcome the statutory review of the federal modern slavery legislation which began on 22 August 2022 and hope it will lead to measures to improve compliance with the Act and the quality of reporting.

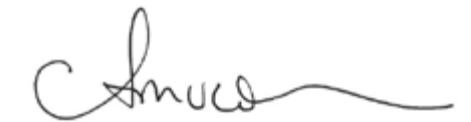
This annual statement, our third since the Act came into force, explains the policies, systems and processes we have adopted to assess our modern slavery risks. It ensures appropriate action is taken and assessed so our management team is held accountable.

In 2022, we embedded a modern slavery risk management program into our procurement process and worked directly with suppliers to enhance their awareness and responsiveness.

We strive to build a culture at CA ANZ which values respect, dignity, diversity and inclusivity.



**John Palermo FCA
Chair**



**Ainslie van Onselen
LLB MAppFin,
Chief Executive Officer**

This Modern Slavery Statement was approved by the Board of Chartered Accountants Australia and New Zealand in its capacity as principal governing body of Chartered Accountants Australia and New Zealand on 8 December 2022. John Palermo has signed this statement in his role as Chair of that body on 8 December 2022.



**DIFFERENCE
MAKERS™**



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Structure, operations and supply chains



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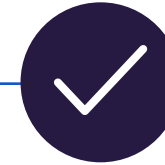


Statement

This Modern Slavery and Human Trafficking Statement (Statement) has been prepared by Chartered Accountants Australia and New Zealand (ABN 50 084 642 571) (CA ANZ) on behalf of itself, its subsidiaries and the New Zealand Institute of Chartered Accountants, a regulatory body established under the New Zealand Institute of Chartered Accountants Act 1996 and controlled by CA ANZ (we, us, our).¹

This Statement has been prepared to comply with section 16 of the Modern Slavery Act 2018 (Cth) and section 54 of the Modern Slavery Act 2015 (UK) (MS Laws). CA ANZ is an Australian registered body corporate that is governed by its Supplemental Royal Charter and the CA ANZ By-Laws and is domiciled in Australia. CA ANZ operates in six jurisdictions: Australia, New Zealand, Hong Kong, Singapore, Malaysia and the United Kingdom.

This Statement sets out how we manage and minimise the risk of modern slavery and human trafficking (together, modern slavery) in our business and supply chains and how we comply with our obligations under the MS Laws. It has been prepared for the financial year ending 30 June 2022.



Our commitment

We believe respecting and protecting human rights enables individuals, societies and businesses to flourish. We are committed to promoting responsible business and upholding high ethical standards in all aspects of our working practices.

As part of that commitment, we do not tolerate modern slavery within our businesses or our supply chains, wherever they operate and have systems and processes in place to address modern slavery risks where they are identified.

Moreover, we hold our members accountable to professional codes of ethics and professional standards.² They must act with integrity and in the public interest, as well as respond to noncompliance with laws and regulations.

How SMEs can create a more sustainable world | CA ANZ



1. The reporting entity is Chartered Accountants Australia and New Zealand (ABN 50 084 642 571). Members of CA ANZ are not liable for the debts and liabilities of CA ANZ.
2. Accounting Professional and Ethical Standards Board Code of Ethics in Australia and the New Zealand Regulatory Board of the New Zealand Institute of Chartered Accountants Code of Ethics.



Organisation

CA ANZ at a glance (as of 30 June 2022)



134,420
MEMBERS



603
FULL & PART TIME
EMPLOYEES³



6
COUNTRIES WITH
OUR OFFICES



\$58 million
SPENT ON GOODS
AND SERVICES

CA ANZ was formed on 31 December 2014 through the amalgamation of the former Institute of Chartered Accountants Australia and the New Zealand Institute of Chartered Accountants.

Our principal objectives include:

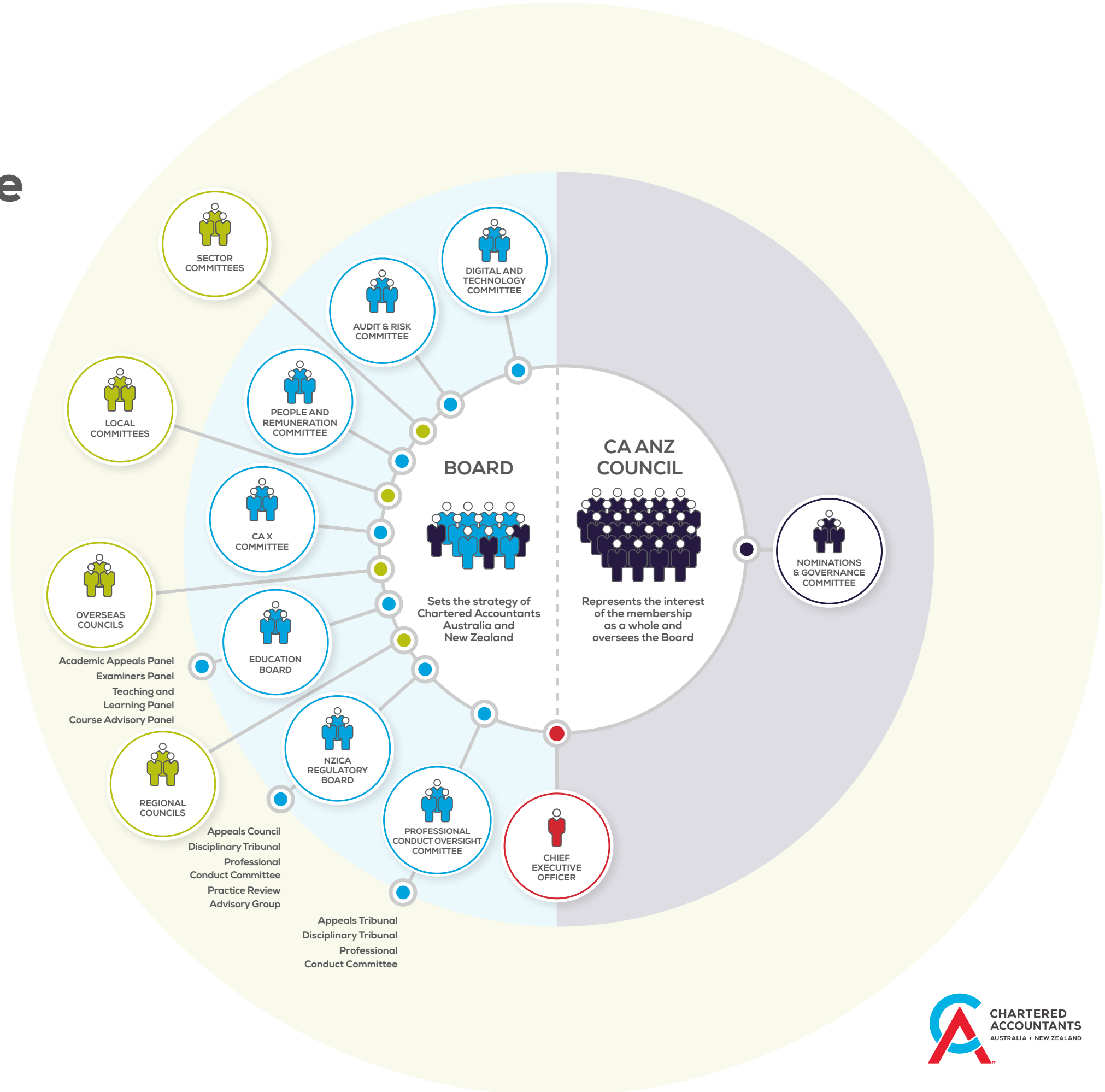
- advocating on behalf of the accounting profession and our members
- training and educating present and future members
- prescribing and regulating high standards of practice and professional conduct
- advancing the profession of accounting.

3. This does not include casual employees and volunteers on committees.



Governance model

-  Board Committee
-  Council Committee
-  Member-based Committee



Members

Our professional body represents 134,420 members globally, as of 30 June 2022.

We support our members to make a difference in the communities in which they work and live. We are committed to advancing the profession through high ethical standards, delivering world class services and education, and advocating for the public good.

CA ANZ offers lifelong learning opportunities, networking events and professional support. We maintain a robust process to discipline poor conduct and support Chartered Accountants who offer services directly to the public. We also review chartered accounting practices to protect the public and the reputation of the profession.

We promote prosperity in the countries in which we operate by supporting our members to work effectively. As a thought leader, we actively engage with governments, regulators and standard setters in Australia and New Zealand, on behalf of members and the accounting profession, to advocate in the public interest. Our members expect us to keep them informed about the latest regulatory and topical issues.





Locations

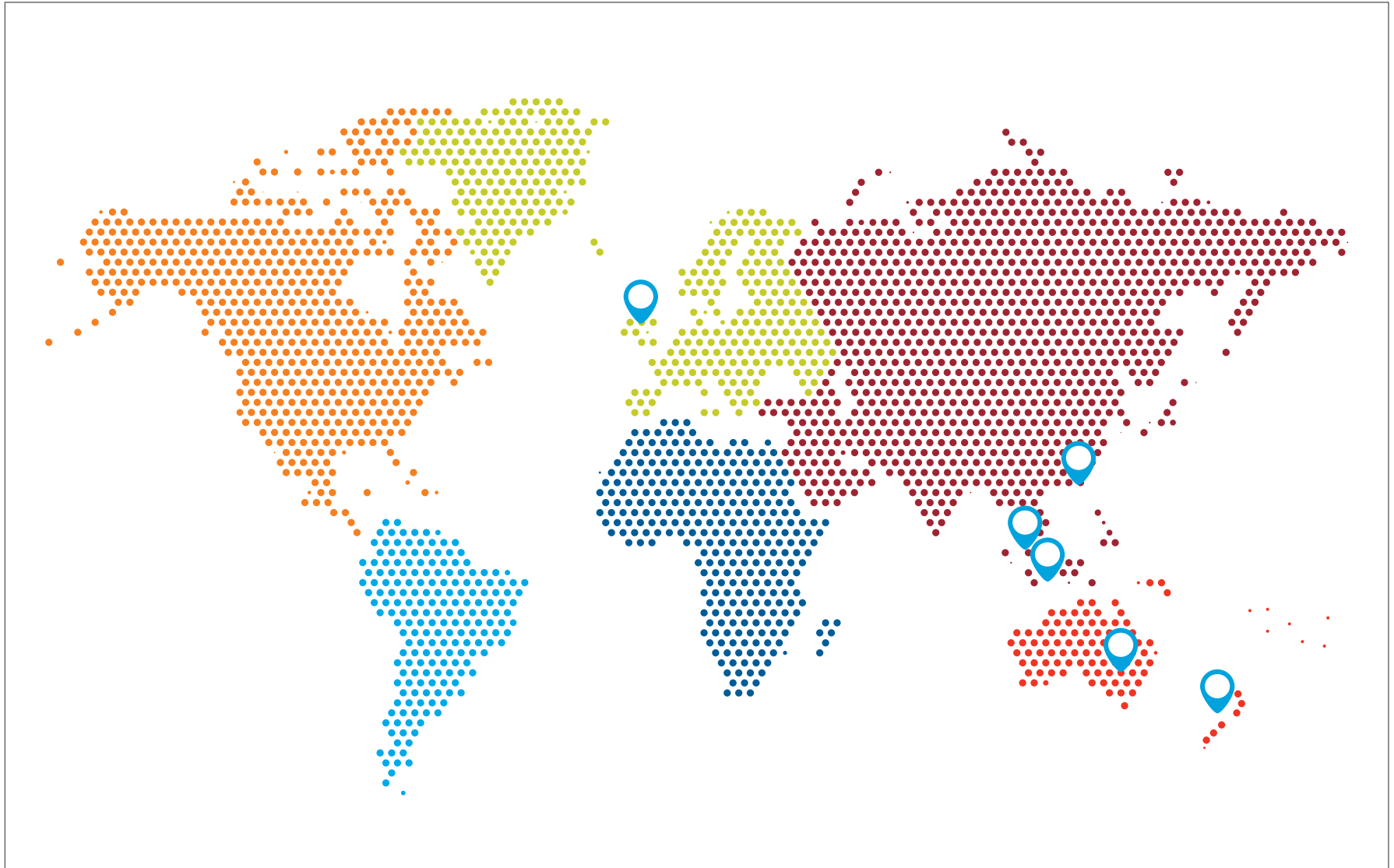
Our main offices are in Sydney, Australia and Wellington, New Zealand.

We employ 603 people in full and part time roles plus casual employees, mostly in Australia and New Zealand. The legal entities that comprise CA ANZ include wholly owned subsidiaries formed in the UK, Hong Kong, Malaysia and Singapore.

Consultation

As an organisation, we take a global approach to modern slavery compliance. Both CA ANZ senior management and local members serve as directors on our subsidiaries' boards. Each board has reviewed and contributed to this Statement and our people in our subsidiaries are trained to recognise and mitigate modern slavery risk in our operations and our supply chain. Our people in these subsidiaries are required to follow CA ANZ policies and procedures, including those relating to modern slavery.

In the 2021-22 financial year, the CA ANZ Procurement team continued to consult with and educate employees and suppliers about modern slavery risks, both locally and internationally to minimise these risks in our supply chain.



Supply chain

Our total spend in the year ended 30 June 2022 across our supply chain was approximately AUD\$58 million to support our members and run our business operations.

CA ANZ's major areas of expenditure include



Professional services including:

- Management, business, marketing
- Insurance, finance, legal services
- Editorial, design
- Computer support or administration



Goods and services to support learning for our members and future members, such as:

- Educators
- Speakers and facilitators



Information and communications technology (ICT) for course delivery, online purchases, examinations, member engagement and CA ANZ operations



Travel, events and catering – our level of expenditure was relatively small due to the impact of COVID-19



Supply chain (continued)

The risks associated with the following categories of supplier relevant to CA ANZ are classified by a third-party social risk ratings provider. This helps CA ANZ identify potential risks in our own supply chain and prioritise steps to mitigate those risks.

For the financial year ending 30 June 2022, CA ANZ did not identify or receive any reports of incidents of modern slavery in our operations or supply chain.

Examples of supplier categories by inherent risk profile





Risks

CA ANZ built on the work undertaken in the previous two financial years to 30 June 2022, mapping the supply base for modern slavery risk factors based on three criteria:



Product or service
(what we purchase)



Geography
(where it is produced)



Supplier complexity
(our supplier's supply chain)

CA ANZ purchases more than 95% of goods and services from Australian and New Zealand-based suppliers. The rest is sourced from the UK and Europe, America, Malaysia, Singapore and Hong Kong. CA ANZ does not directly or knowingly source any goods or services from suppliers based in Xinjiang, China.

We have identified that the technology sector poses the greatest inherent risks of modern slavery and have focused on our offshore suppliers, as well as those who produce promotional branded goods. CA ANZ's procurement, IT, marketing and communications and facilities teams work closely together to monitor these areas.

As part of the CA ANZ tender process, we ask suppliers whether they comply with MS Laws including the Modern Slavery Act 2018 (Cth), the Modern Slavery Act 2018 (NSW), the Modern Slavery Act 2015 (UK) and other equivalent legislation. We also ask them to ensure their suppliers, contractors and third-party providers comply with MS Laws.

We require that suppliers provide us with their own Modern Slavery Statement and information about their risk assessments and other due diligence steps.

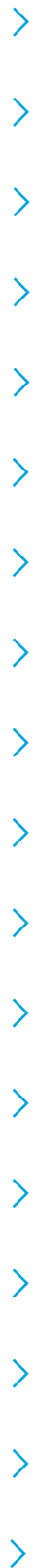
Our operations and people

CA ANZ also assesses modern slavery risks directly in our operations, especially in connection with our people in Australia, New Zealand and

overseas. As a membership body, mainly employing and contracting with highly skilled office-based professionals, the modern slavery risks are typically lower than those that can arise in other parts of our supply chain.

Our people and employment policies, including our Human Rights Policy, codify our commitment to engaging with and remunerating our people (including both employees and contractors) fairly and in compliance with the relevant local legislation.

We are vigilant against modern slavery risks in our own workplace. We recognise that modern slavery presents differently around the world and that in Australia and New Zealand and our offices around the world, serious exploitation can still occur.



Risks (continued)

Our people leaders and our People and Culture team strive to provide a safe and supportive environment. This enables our people to grow their skills, add value and celebrate success in a supportive and modern slavery-free environment.

CA ANZ takes practical action to ensure the safety, health and wellbeing of our people, members, guests, suppliers and contractors, including by offering a flexible working environment, whether working remotely or in the office.

During the COVID-19 pandemic and the transitions between health authorities' mandates to work from home and subsequent return to the office, we recognised that, due to personal circumstances, some people are affected to a greater degree, including caring for sick relatives. CA ANZ offers extended flexibility for these people (including the ability to work completely remotely where applicable to their role).

The Executive Team continues to meet regularly to review the situation, assess the risks and act to minimise the risk to our people and their communities.



EVOLVING OUR RESPONSE TO COVID-19

We recognise that COVID-19 has continued to disrupt supply chains globally and remain vigilant against any modern slavery consequences of this for our organisation.

CA ANZ responded to the pandemic by shifting priorities and creating tailored resources to help our members assist businesses and communities affected by the pandemic. This included the digital delivery of resources for members, as well as the CA Program itself, enabling candidates to continue their path to obtaining accreditation.

Therefore, over FY2021-22 we continued to spend more on technology-related goods and services, and less on face-to-face events, printed materials, promotional goods, travel and hospitality suppliers.





Actions





Actions

Building on the foundations developed over the past two years, we set specific milestones and measurable results to hold stakeholders accountable.

Our actions taken to identify modern slavery in the last financial year were effective and appropriate for the risk profiles of our suppliers which are mainly professional

services. However, we continually assess what we can do better. We will remain vigilant to ensure that our actions and practices are relevant, effective and appropriate.

Our current practices are based on five levers:



Governance and resources



Policies and procedures



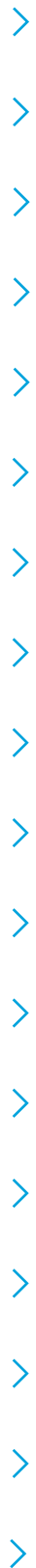
Systems and processes



Buyers' capacity building



Reporting



Governance and resources

As part of our approach, we apply a comprehensive modern slavery risk management program with visibility and sponsorship from the CA ANZ leadership team. Our governance model informs our supplier selection and management decisions, with defined internal roles and responsibilities across the organisation to support the program.

Buyers:	<ul style="list-style-type: none"> Responsible for supplier selection and due diligence. They serve as the contact point between business and supplier and ensure collaboration and communication of program objectives.
Executive team:	<ul style="list-style-type: none"> Helps define the organisation’s vision and the modern slavery risk management strategy.
Legal team:	<ul style="list-style-type: none"> Ensures that modern slavery obligations on CA ANZ’s suppliers have contractual force.
People and Culture team:	<ul style="list-style-type: none"> Ensures that we comply with all workplace laws and champions our people’s engagement and performance.
Procurement team:	<ul style="list-style-type: none"> Defines the modern slavery risk management framework, drives implementation, provides clear targets and clean supplier data, trains buyers and participates in the monthly steering committee.
Public Affairs team:	<ul style="list-style-type: none"> Strengthens our messaging, both internally and externally about our efforts to combat modern slavery.
Risk, Compliance and Operational Excellence team:	<ul style="list-style-type: none"> Operates as a second line of defence and reviews the efficacy of CA ANZ’s modern slavery risk management program.

Policies and procedures

Our policies and procedures help us assess, monitor and reduce the risk of modern slavery in our global supply chain. CA ANZ also has in place policies and procedures that aim to ensure safety and fairness in the workplace.

Human Rights Policy

This policy formalises our commitment to support and respect all internationally recognised human rights as defined by:

- [Universal Declaration of Human Rights](#)
- [International Bill of Human Rights](#)
- [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#)
- [United Nations Guiding Principles on Business and Human Rights](#)

Our Human Rights Policy applies to all our people (including employees, contractors, agents and officers) and our suppliers and their employees, sub-contractors (back to source), agents and business partners.

By requiring compliance with this policy, we seek to uphold and protect fundamental human rights (including preventing modern slavery) not just within our operations, but within our supply chains as well. Our Human Rights Policy is reviewed every three years.

Supplier Code of Conduct

This code sets out the standards for each supplier that provides goods or services to us, or performs work for us globally, as well as their personnel. The Code of Conduct requires suppliers to:

- follow best practice
- counter modern slavery in their supply chains and operations
- comply with applicable anti-modern slavery laws
- notify us of any breach
- comply with minimum wage and overtime laws.

Our Supplier Code of Conduct is published on our website and reviewed once every three years. Compliance is monitored through the due diligence process described below.



Policies and procedures (continued)

Anti-Bribery and Corruption Policy

CA ANZ is committed to ensuring compliance with Anti-Bribery and Corruption obligations in the countries in which it operates. This means that CA ANZ is committed to conducting its business with honesty and integrity, to ensure high ethical standards are demonstrated in our actions and business relationships.

Due to potential connections between bribery and corruption and modern slavery, our Anti-Bribery and Corruption Policy also provides a level of assurance from a modern slavery perspective.

Code of Conduct

CA ANZ is committed to conducting its business with honesty and integrity and to ensure that CA ANZ people demonstrate high ethical standards in our actions and business relationships.

The key principle underpinning the Code of Conduct is compliance with laws, regulations and ethical standards, including that our people comply with our Modern Slavery Statement. We strive to ensure that CA ANZ Group maintains its social licence to operate.

Statement on Diversity and Inclusion

We are committed to an inclusive culture that values diversity, provides equitable employment outcomes, and empowers all of us to realise our collective and individual potential.

Procurement Policy

The fundamental purpose of this policy is to ensure that all procurement activities are performed in a manner that is fair, ethical, socially responsible and transparent, aiming to achieve a value for money outcome whilst appropriately managing risk.

Whistleblower Policy

CA ANZ has a Whistleblower Policy which demonstrates our commitment to a corporate culture that encourages the reporting and investigation of misconduct or serious wrongdoing in order to protect the integrity and standards of ethical behaviour in our business.

Systems and processes

Wherever possible, CA ANZ seeks to include contractual terms in its supply and tender contracts, to monitor for and prevent modern slavery

These contractual terms ensure suppliers comply with our relevant policies, are obliged to take reasonable steps to ensure that there is no modern slavery in their own operations or supply chain and must notify CA ANZ if they become aware of any breaches.

Risk assessment

We categorise our suppliers as low, medium or high-risk for modern slavery depending on country, category and spend based on an initial risk assessment. We also use insights from Robobai's Anti-Slavery platform.

We focus on business operations and supply chains that present the highest level of risk by product or service, sector and geographic location. We rank our response based on the likely severity of consequences to those who may be affected.

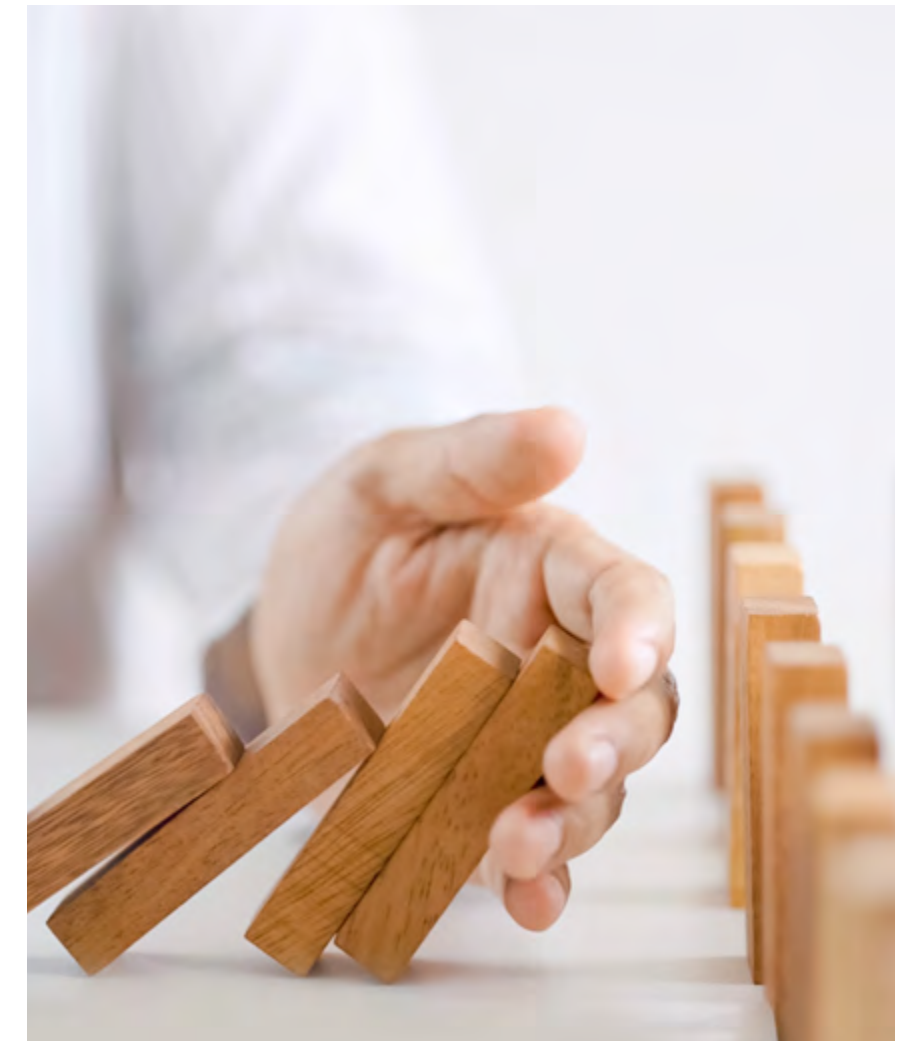
We ask all suppliers identified as potentially high-risk from a modern slavery perspective to complete an assessment with EcoVadis or a CA ANZ Modern

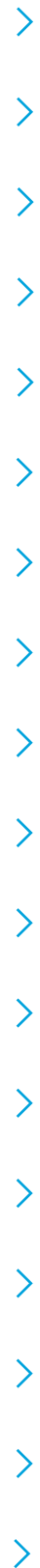
Slavery Assessment. New and renewing suppliers with a spend of over AUD\$50,000 excluding GST must take the same assessment, regardless of their risk profile.

In our last statement, we reported that from 1 July 2020 to 30 June 2021, CA ANZ suppliers completed 50 modern slavery risk assessments. Between 1 July 2021 to 30 June 2022, CA ANZ suppliers completed 58 assessments.

We continue to invite new suppliers to be assessed and incumbent suppliers to be reassessed as required. The number of assessments completed by suppliers is an internal key performance indicator (KPI) that supports our objective of creating positive social impact.

Five of the supplier assessments this year highlighted the high inherent risk of modern slavery in the supply chain. These reflected services provided in offshore locations and in a high-risk sector. All five suppliers were asked to provide further information and supporting documentation





Systems and processes (continued)

which we have assessed as evidence to reduce risk to a more acceptable level.

EcoVadis provides a supplier scorecard with detailed insights on labour and human rights risks, highlighting performance strengths and improvement areas. Suppliers can build improvement plans online, update corrective action plans and receive feedback from CA ANZ. Supporting documentation can be uploaded to provide evidence of the actions implemented, build improvement plans online, update corrective action plans and receive feedback from CA ANZ.

CA ANZ also has processes in place to review a supplier where a modern slavery risk is brought to our attention in relation to that supplier (such as voluntary disclosure or public media articles or information on relevant websites).

We have developed formal modern slavery risk management internal guidelines, which outline definitions, processes, supplier communication templates and frequently asked questions. This enables buyers at all levels to execute the modern slavery risk management program goals. The guidelines are shared through the CA ANZ intranet portal, so they are accessible to all team members.



Modern slavery communication

CA ANZ publishes comprehensive information on our website that informs members about modern slavery and provides links to further resources on relevant government sites. On our website you can find:

- our Modern Slavery and Human Trafficking Statements
- country specific legislation
- our latest articles and submissions on modern slavery
- reporting requirements and how that applies to business and supply chains
- modern slavery webinar recordings

Assessing the effectiveness of our actions

CA ANZ recognises that while modern slavery and human trafficking distorts global markets, undercuts responsible business and poses significant legal and reputational risks, victims feel the most severe effects.

While we maintain quantitative measures (such as number of suppliers assessed) to provide internal assurance on our policies and processes, we do not believe that these metrics have direct and measurable value to the victims of modern slavery. Modern slavery is often hidden, and where it has not already been identified and made public (such as in news reports), it is not typically disclosed in the due diligence process.

Instead, CA ANZ emphasises our ability to work with our suppliers to ensure they have appropriate policies and procedures to combat modern slavery in their own operations and with their own suppliers. We believe that, indirectly, transparent supply chains reduce the number of victims of modern slavery worldwide. It is through this lens that we have assessed the effectiveness of our actions.

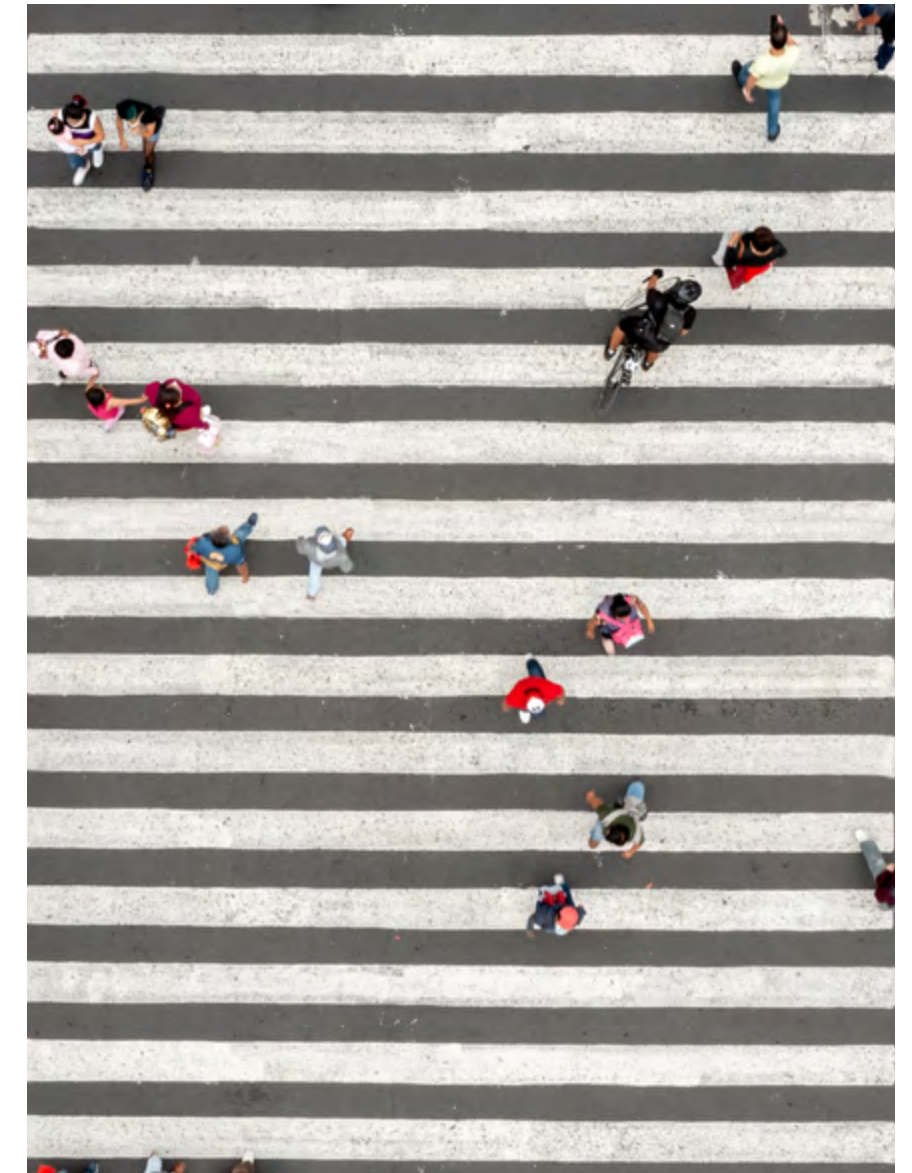
In this financial year, one of our suppliers had a low score (high risk) in labour and human rights in

their EcoVadis report, due to a lack of documentary evidence. When asked, this business provided further details about their ESG committee, annual report, various ISO accreditations, processes, training and associated documentation aimed at identifying modern slavery risks in the countries where they operate. When they conducted a second risk assessment with additional documentation, they were deemed a medium risk.

We held meetings with senior management at companies that have not performed well in their modern slavery assessments and conducted some site visits. Our approach is to encourage dialogue on the subject, and we believe we have made a meaningful and effective impact on them.

In the upcoming financial year, our Risk, Compliance and Assurance team will conduct an assurance review of our modern slavery risk assessment framework to ensure that we are effectively identifying opportunities to leverage our power as a purchaser to effect change.

We will continue to play our role in the global community to contribute to a better world where modern slavery is unable to thrive.



Buyers: training and champions

Through training and creating a network of champions, CA ANZ is educating buyers in best practice to reduce modern slavery risk

The CA ANZ Procurement team conducts buying workshops at the divisional level and regularly holds one-to-one training to ensure that buying complies with our enterprise risk management and policy frameworks.

CA ANZ has also created a network of champions, made up of frequent and influential buyers, who have increased awareness at the grassroots level among suppliers and support our risk management program.

We ensure that our champions and buyers, who are geographically dispersed and represent different teams across CA ANZ, are trained and engaged in the program and assist us to:

- refine our standardised processes and tools
- gather and document key information internally
- support and coach teams
- conduct training sessions

We train our buyers to explain the importance of the program and how it aligns with CA ANZ's values. Our buyers also help suppliers understand the benefits of a detailed EcoVadis assessment. This includes analysis and delivery of their corporate social responsibility scorecard which they can share with other clients, detailed scoring and feedback on their performance and access to a corrective action plan.

Reporting

The CA ANZ Procurement team generates a quarterly internal management report that goes to a steering committee made up of senior management and executives. The report shows progress towards achievement of our goals by performing assessments, tracking the number of assessed and high-risk suppliers and taking action to address high risks.



Our achievements in 2021-22

We monitored, reviewed and improved the effectiveness of our modern slavery risk management framework and processes with our suppliers, building on the insights we had gained over the past two years. We focused on four areas.

Prioritising supplier engagement

To maximise our program's impact and mitigate risk, we ranked suppliers based on risk, then spend, critical supply and purchasing leverage. We refreshed our supplier segmentation model, updating risk ratings and supplier data.

We stepped up engagement with suppliers, evaluated assessment outcomes and worked with suppliers as they implemented their EcoVadis improvement areas and/or corrective action plans. During this financial year, these suppliers scored an average of 55.4% for labour and human rights which is better than the 47.3% for the average EcoVadis assessments of the same spend categories.

Streamlining policies, procedures and processes

CA ANZ introduced the Robobai Anti-Slavery platform to gain insights into our supplier spend,

categorising suppliers as low, medium or high risk for modern slavery depending on their country, category and spend.

We also reviewed some leading digital tools, as we look to automate our supplier qualification and tender process, while incorporating modern slavery risk assessments into procurement operations. This work continues.

We updated our procedures to ensure that modern slavery risk is addressed in relevant internal guidelines, induction and training programs. We communicated this progress to our buyers, suppliers and partners.

Building supplier capacity

To strengthen our supplier engagement, we held a webinar on modern slavery risk management in May 2022, to share best practices with them and show how they can access resources on the EcoVadis platform.

We developed an external webpage for our current and prospective suppliers with information about being a CA ANZ supplier. The objective is so that suppliers can understand our Supplier code of

conduct, Human Rights policy, Anti-bribery and Corruption policy and our most recent Modern Slavery Statement.

Advocacy

In New Zealand, we made a submission to the Ministry of Business, Innovation and Employment's consultation on modern slavery and worker exploitation in June 2022. To share knowledge on the issue, we also facilitated an event for our members in September 2021.





Future plans



Future plans

We will continue to monitor, review and improve the effectiveness of our modern slavery risk management framework and processes with our suppliers, building on the insights we've gained over the past two years.

The areas we will focus on in 2022-23 are:

Responsible Procurement Framework

CA ANZ's new Responsible Procurement Framework will influence our supply chain management. The Framework will involve environmental, social, and corporate governance (ESG) and economic considerations, as well as due diligence processes that identify, manage and mitigate supply-chain risks.

Streamlining policies, procedures and processes

We plan to introduce software to automate our supplier qualification and tender process, while incorporating modern slavery risk assessments into procurement operations.

Supplier assessments

We will continue to conduct risk assessments, as part of the modern slavery risk management framework and focus on suppliers that meet the following risk thresholds:

- medium to high risk from a modern slavery and human trafficking perspective and annual spend of more than AUD\$50,000 excluding GST, or
- specific modern slavery risks that have come to CA ANZ's attention (such as voluntary disclosure or public media articles or websites).

The amount of spend on goods and services does not always correlate with modern slavery risk, and once-off suppliers and smaller suppliers may also present high modern slavery risks. We will continue to monitor these suppliers by using AI-based screening services (such as Robobai), improve our procurement processes and train our internal stakeholders. By continuing to rationalise our supplier base, we will also lower CA ANZ's overall modern slavery risk.

Building supplier and buyer capacity

We will hold further supplier and buyer workshops and webinars about modern slavery risk management best practices, company sourcing and related policies and processes.

Creating shared value

To define our approach to modern slavery risks more broadly, we will incorporate an integrated reporting suite of metrics with other corporate social responsibility initiatives. This will include other KPIs, relating to corporate social responsibility and initiatives that align with existing modern slavery risk management processes and systems.

We are also exploring ways to co-create corporate social responsibility value to increase CA ANZ's overall performance. This may involve members, employees, suppliers and other stakeholders.



Appendix

The table below indicates which section of this Statement addresses the criteria set out in the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2015 (UK).

AUSTRALIA - LEGISLATIVE REQUIREMENT Statement must provide information to...	Section
identify the reporting entity;	Statement (page 5)
describe the structure, operations and supply chains of the reporting entity;	Structure, Operations and Supply Chains (pages 4 – 13)
describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls;	Risks (pages 12 and 13)
describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes;	Actions (pages 14 – 20)
describe how the reporting entity assesses the effectiveness of such actions;	Assessing the Effectiveness of our Actions (page 21) & Our achievements in 2021-22 (page 23)
describe the process of consultation with any entities that the reporting entity owns or controls; and	Consultation (page 9)
include any other information that the reporting entity, or the entity giving the statement, considers relevant.	This Statement

UK - LEGISLATIVE REQUIREMENT Details on an organisation's...	Section
structure, business and supply chains;	Structure, Operations and Supply Chains (pages 4 – 11)
its policies in relation to slavery and human trafficking;	Policies and Procedures (pages 17 and 18)
its due diligence processes in relation to slavery and human trafficking in its business and supply chains;	Systems and Processes (page 19 and 20)
potential risks of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;	Risks (page 12 and 13) & Systems and Processes (page 19 and 20)
its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate; and	Assessing the Effectiveness of our Actions (page 21) & Our achievements in 2021-22 (page 23)
the training about slavery and human trafficking available to its staff	Buyers' capacity building and training (page 22)