

Bank Australia

Modern Slavery Statement 2024



Acknowledgement of Country

At Bank Australia we respectfully acknowledge the Traditional Owners of all the lands on which we live and work, and we pay our respects to elders past and present. We recognise their continued connection to the land, waters and culture and we acknowledge their sovereignty has never been ceded. Our head office is located on the land of the Wurundjeri people of the Kulin Nation.

Introduction

Bank Australia Limited ABN 21 087 651 607 ('Bank Australia')

The Modern Slavery Act 2018 (Cth) places an obligation on entities based, or operating, in Australia, which have an annual consolidated revenue of more than AUD100 million, to analyse their supply chain and business operations to identify and address their modern slavery risks. Entities required to comply with the Modern Slavery Act must prepare annual statements that contain the actions taken to prevent the risk of modern slavery occurring.

This statement reports on our actions in identifying, assessing and managing modern slavery risks within our supply chains and operations business (lending and investments) in respect of the period 1 July 2023 to 30 June 2024 (FY24).

Throughout this statement we reference 'Modern Slavery', which includes human trafficking, slavery, servitude, forced or compulsory labour, debt bondage, forced marriage and child labour. We remain focused to operating responsibly by continuing ethical standards across our supply chain and business operations and will constantly strive to improve our approach for identifying and managing modern slavery risks.

Mandatory reporting criteria	Page number/s
1 Identify the reporting entity.	4
2 Describe the reporting entity's structure, operations and supply chains.	4-5
3 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	5-10
4 Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	7-10
5 Describe how the reporting entity assesses the effectiveness of these actions.	11
6 Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	Not applicable
7 Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Throughout



About Bank Australia

Our structure and operations

Bank Australia is a customer owned bank, operating throughout Australia. We provide banking and financial products and services to approximately 192,000 individual and business customers.

Our purpose is to inspire and empower our customers to use their money to create a world where people and the planet thrive. A portion of our profits are returned to customers through better rates and fees and we use our lending and investments to create a positive social and environmental impact. Please refer to our [2024 Impact Report](#) to learn more.

Bank Australia is 100% Australian based, and we remain committed to keeping employees here in Australia. We operate throughout Australia and employ approximately 610 staff, with our headquarters in Collingwood, Victoria. Our national lending and contact centres are based in Victoria's Latrobe Valley, our contracts processing team is based in Bendigo, and we have credit card and personal loans teams in Chatswood, New South Wales. During the reporting period, we operated branches across Victoria, New South Wales, Queensland, and the ACT.

Bank Australia does not own or control any reporting entities and we have no operational subsidiaries either domestic or international for which we need to report.



Our purpose is to inspire and empower our customers to use their money to create a world where people and the planet thrive.



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We use our lending and investments to create a positive social and environmental impact.

Our supply chain and business operations

Our business operations comprises of both lending and investment operations. As a customer owned bank, our lending is largely to individual customers (95% as at 30 June 2024) for their homes, cars and everyday living and this lending is outside the scope of our modern slavery assessment. Our commercial loan portfolio represents 5% of our total lending.

Bank Australia also invests in a portfolio of liquid assets to ensure we have access to a sufficient amount of money to comfortably meet the needs of our customers and regulator liquidity requirements.

The bank understands that through its supply chain, other third party relations and business operations it can be exposure to the risk of modern slavery. Our supply chain provides services for direct banking operations as well as goods and services to support our facility operations.

Our supply chain, commercial loan and investment portfolios were reviewed as part of our Modern Slavery assessment.



FY 2024 Summary

Bank Australia continued to improve our approach to the risk of modern slavery in FY24:

- ✓ Implemented a new supplier management system to uplift the bank's supplier due diligence process.
- ✓ We have continued to build on our screening of lending, moving from an in-house developed tool to using risk ratings from a more comprehensive supply chain analysis tool.
- ✓ Uplifted our Whistleblower program by partnering with Your Call – an Australian-based, B Corp certified and independent whistleblower disclosure service. Your Call offers multiple ways for people to speak up about misconduct, including modern slavery, when they are not comfortable using internal channels.
- ✓ Continued partnering with ethically and sustainably sourced suppliers including other B Corp certified organisations.
- ✓ Completed a disclosure quality assessment of FY23 and FY24 statements to ensure mandatory reporting criteria are being met.
- ✓ Joined a mutual bank working group, focused on supporting shared suppliers to uplift their modern slavery prevention practices.



Our spend categories

Spend Category	Description	% of total spend	% Australian based
Service Enablement	Includes transaction processing, customer service costs, printing and postage, and broker costs.	34%	100%
Corporate Services	Includes professional services (e.g., audit, legal and consulting), marketing, staff education, and recruitment.	17%	98%
Technology	Includes IT, telecommunications, computer hardware and software, maintenance, and service providers.	30%	95%
Property	Includes rental, refurbishments, maintenance, utilities, cleaning, and security.	14%	100%
Other	Other spend	5%	100%

Figures are approx. and rounded to the nearest percentage.

Assessment and mitigation of Modern Slavery risk

Supply chain

Assessment



We complete an initial assessment of inherent exposure to modern slavery risk for all our suppliers. The assessment is primarily based on their industry categorisation, country of registration and their general operation. Bank Australia supports domestically registered suppliers and manufacturers where possible. We review each supplier based on their initial risk assessment category: low, medium and high risk. Suppliers assessed as high risk primarily sit in the service enablement, technology and property spend categories, and include stationery, information technology equipment, facilities renovations, uniforms, cleaning and furniture.

Due diligence



We then further assess suppliers for modern slavery risk through supplier surveys. Supplier surveys are sent to those suppliers who have been assessed as having a high inherent risk. Once survey responses are returned, suppliers are again assessed to determine if the preliminary high inherent risk rating is warranted and if required, further engagement with the supplier occurs to confirm what we consider to be fair and ethical business practices. In FY24, we completed 8 surveys, with all having a final risk rating of low or very low.

Bank Australia has a membership with the Supplier Ethical Data Exchange (Sedex) which provides tools and services to help members understand and assess their suppliers to ensure they are upholding safe, ethical and sustainable business practices. Where it can be used, the reference information from Sedex assists in the assessment of modern slavery risk.

Procurement policy



Our Procurement Policy was updated in 2023, and details procurement governance requirements. It is based on the following key principles:

- Positive procurement (alignment to our values),
- Financially responsible procurement, and
- Compliance with applicable laws

Engaging with what we see as the right suppliers helps us to ensure we deliver quality products and services to our customers in a financially responsible way, while at the same time supporting our values.

Supplier Code of Practice



The purpose of the Supplier Code of Practice is to detail Bank Australia's expectations in relation to all suppliers providing goods and/or services to the Bank including assessing and addressing the risks of modern slavery. Our Supplier Code of Practice helps to embed our principles and values into our business practices.

The bank considers general Environmental, Social & Governance (ESG) factors when deciding whether to do business with specific companies to help manage risk and ensure alignment with the bank's values. These ESG factors include but are not limited to fair payment and treatment of workers, adherence to laws regarding bribery, corruption, environmental regulation, and prevention of human rights abuses.

B Corp accreditation

Certified B Corporations are businesses that meet the highest standards of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose.

As a B Corp bank in Australia, we're proud to sit alongside other B Corp certified banks around the world. We endeavour to partner with other B Corp certified organisations, as well as those who practice and prioritise positive social and environmental change.

Certified



Corporation

In FY24 we grew our number of B Corp partnerships to 23.



Commercial lending assessment



In FY24, we improved our approach for screening the bank's commercial lending, moving from an in-house developed tool to using risk ratings from a more comprehensive supply chain analysis tool.

The updated approach uses risk ratings derived from Sedex (Supplier Ethical Data Exchange), an international collaborative platform for sharing ethical supply chain data. Sedex's Radar tool compiles human rights and environmental risks by country, sector and activity, using a strong breadth and depth of local and international data sources such as the International Trade Union Confederations Global Rights Index, World Bank, United Nations Development Programme, and more. The ratings are labelled 'high', 'medium', or 'low' are reviewed annually by Sedex to ensure accuracy.

We used Sedex's labour standards ratings for Australia to evaluate the risk of modern slavery in the sectors we lend to. This rating assesses risks associated with forced labour, freedom of association, health, safety & hygiene, children & young workers, wages, working hours, discrimination gender and regular employment. Sedex uses International Standard Industrial Classification of All Economic Activities (ISIC), mapped to ANZSIC codes, which we ascribe to each commercial loan we fund. For most of our commercial loans (>99% by loan value), we used specific activity ratings to identify labour standards risk. The remainder of our loans (<1% by loan value) are mapped to the higher, sector level.

Using this updated methodology, sectors previously assessed as 'High' risk were reviewed and resulted in a 'Medium' or 'Low' risk rating.

Responsible Banking Policy



We have a responsible banking policy that describes our approach to lending and investments. This policy includes steps to screen for sectors that the Bank does not fund as they do not align with our values and our purpose, including fossil fuels, tobacco, live animal export and gambling. Our responsible banking policy also includes screening for general ESG factors, including modern slavery.

Investment portfolio due diligence



Our assessment of the inherent risks in our commercial lending and investment portfolio guides our due diligence program.

Modern Slavery screening is integrated into our commercial loan approval summary for all new commercial loans.

In our investment portfolio, the majority of investees publish their own Modern Slavery Statements, which enables insight into their assessment of modern slavery risk. In 2024, we tracked all investee modern slavery statements where available. A plan to roll out an investee statement assessment template has been delayed, and is expected to commence in FY25.

Customer due diligence



All Bank Australia customers undergo Know Your Customer (KYC) due diligence to confirm their identity and assess risks associated with fraud and money laundering or terrorism financing, and these activities may identify indicators of modern slavery risk. We also conduct ongoing customer due diligence throughout the customer relationship and monitor customer accounts for unusual transaction activity. Key risk indicators are reviewed periodically to identify emerging or an increase in risk. Customers identified with having an elevated risk are subjected to an enhanced due diligence review.

Frontline staff complete annual modern slavery eLearning training, and also receive training on how to identify and assist customers experiencing vulnerability. The bank has a dedicated Customer Care team, who as part of their role offer referral services to customers that can provide specialised support.

Policies



The bank has several key policies which support human rights and may assist in the prevention of modern slavery across our operations and supply chain. All policies are available to staff via the Bank's intranet.

- Staff Code of Conduct
- Diversity and Inclusion Policy
- Health, Safety and Wellbeing Policy
- Anti-Discrimination, Bullying and Harassment Policy
- Whistleblower Program
- Procurement Policy
- Responsible Banking Policy
- AML/CTF Policy
- Fraud and Corruption Policy

People



Bank Australia considers our risk of modern slavery through our hiring practices for employees as low.

We only hire employees that live and are permitted to work in Australia in accordance with the Fair Work Act.

Training, Engagement & Advocacy



All staff complete compulsory Modern Slavery training when they join Bank Australia and annually thereafter. The training is delivered via the bank's elearning platform and consists of three 40 minute modules. The training aims to familiarise staff with the concept of Modern Slavery and Australian Modern Slavery law, and assist staff in identifying and raising modern slavery concerns so we can respond appropriately. In FY24 we saw a 100% completion rate of this training.

Additionally, in FY24 key staff across our compliance and procurement & infrastructure teams completed training via the UN Global Compact Academy, and via our internal online learning platform. Relevant procurement staff also completed the Ethics, Integrity, and Probity in Procurement training provided by the Chartered Institute of Procurement & Supply.

In FY24, the Director of Sustainability Assurance at PwC presented to the Responsible Banking Committee on Modern Slavery. This presentation covered global and national contexts, Australia's Modern Slavery Act, modern slavery in financial services sector, 'red-flags' indicators, and the role of functional teams in identifying and managing modern slavery risks.

The bank is represented on the Responsible Investment Association Australasia (RIAA)'s Human Rights Working Group, the Australian Banking Association (ABA)'s Human Rights working group, and a mutual bank working group advocating for supplier engagement and uplift on Modern Slavery Risk.

Measuring effectiveness

We regularly review the effectiveness of our modern slavery approach. The current effectiveness measures we use include:

Measuring effectiveness	
Completing supplier due diligence process and exiting suppliers for critical non compliance to modern slavery requirements	Eight supplier surveys were completed during the reporting period. No suppliers were exited for non-compliance.
Screening commercial loans and investments in line with Bank Australia’s Responsible Banking Policy	As at 30 June 2024, 1075 commercial loans were screened: <ul style="list-style-type: none">• 0 identified as high risk• 105 identified as medium risk• 970 identified as low risk
Completing investee due diligence for modern slavery risk in institutions	As at 30 Jun 2024, we held investments in 63 institutions. 59% of these institutions had current modern slavery statements.
Partnering with additional B Corp accredited organisations where possible	Currently 23 suppliers are certified BCorps. In FY24, Bank Australia partnered with YourCall, a BCorp certified whistleblower disclosure service
Completing annual compulsory compliance training by all staff	100% completion rate
Investigating customer complaints and grievances with indicators that may relate to modern slavery	Zero complaints received in relation to Modern Slavery during FY24
Investigating any disclosures via our Whistleblower process	Zero whistleblower disclosures during FY24



Improvement

We aim to continually improve our approach to minimising modern slavery risks in our supply chain and business operations.

Some of our plans for FY25 include:

- Build out our Compliance Obligation Register to include obligations related to Modern Slavery
- Continue participation in a mutual bank working group for supplier engagement
- Continue to partner with B Corp certified organisations, as well as those like-minded organisations who practice and prioritise positive social and environmental change
- Commence roll out of template to review key themes and risks for assessing all investee modern slavery statements

This statement was approved in November 2024 by the Board of Bank Australia in their capacity as the principal governing body of Bank Australia, and signed by Damien Walsh in his role as Managing Director.



Damien Walsh
Managing Director



