

# AUSTRALIAN INSTITUTE OF MARINE SCIENCE MODERN SLAVERY STATEMENT 2024



## Australian Institute of Marine Science

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### Cover photo:

AIMS Headquarters at Cape Cleveland, Queensland  
Image: J Gioffre

## Contents

<b>1</b>	<b>BACKGROUND .....</b>	<b>1</b>
<b>2</b>	<b>OUR ORGANISATION .....</b>	<b>2</b>
<b>3</b>	<b>RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS .....</b>	<b>8</b>
<b>4</b>	<b>ACTIONS TAKEN BY AIMS TO ASSESS AND ADDRESS THESE RISKS .....</b>	<b>12</b>
<b>5</b>	<b>ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS.....</b>	<b>15</b>
<b>6</b>	<b>PROCESS OF CONSULTATION .....</b>	<b>16</b>
<b>7</b>	<b>COUNCIL APPROVAL .....</b>	<b>17</b>

# 1 BACKGROUND

The Australian *Modern Slavery Act 2018* (Cth) (“the Act”) is a legislative framework designed to identify, address, and reduce the incidence of modern slavery in global supply chains. The Act establish a reporting requirement for certain large entities (organisations), who are required to publish an annual Modern Slavery Statement that describes their actions to assess and address modern slavery risks in their operations and supply chains.

Modern slavery occurs in situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It includes trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour, and deceptive recruitment practices.<sup>1</sup> This is a statement made by the Australian Institute of Marine Science (‘AIMS’), as an entity that meets the reporting threshold for the Act. It describes our actions to assess, address, and mitigate the risks of modern slavery in our operations and supply chains.

This Statement refers to actions taken in the period between 1 July 2023 to 30 June 2024 (‘the reporting period’).

This Statement contains forward-looking statements. These statements are based on assumptions and expectations at the time of publication that are by nature subject to change; as such these statements cannot be guaranteed or relied upon.

Section	Mandatory Criteria	Page
<b>6(1)(a)</b>	<b>1</b> Identify the reporting entity	2
<b>16(1)(b)</b>	<b>2</b> Describe the structure, operations and supply chains of the reporting entity	2
<b>16(1)(c)</b>	<b>3</b> Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entity that the reporting entity owns or controls	8
<b>16(1)(d)</b>	<b>4</b> 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	12
<b>16(1)(e)</b>	<b>5</b> Describe how the reporting entity assesses the effectiveness of such actions	15
<b>16(1)(f)(i)</b>	<b>6</b> Describe the process of consultation with: (i) any entities that the reporting entity owns or controls	16

**TABLE 1: SUMMARY OF MANDATORY CRITERIA**

<sup>1</sup> [Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities](#), Attorney-General’s Department (2023)



## 2 OUR ORGANISATION

The Australian Institute of Marine Science (ABN 78 961 616 230) ('AIMS', 'us', 'we', 'our') is a corporate Commonwealth entity (under the *Public Governance, Performance and Accountability Act 2013* (Cth)) that conducts scientific research with operations across Australia. We are established and operate under the provisions of the *Australian Institute of Marine Science Act 1972* (Cth) ('AIMS Act'), which sets out our functions and powers.

AIMS is registered in Australia at the address 1526 Cape Cleveland Road, Cape Cleveland, Queensland, 4810. AIMS does not own or control any subsidiary entities. AIMS is also a registered charity.



### 2.1 Our purpose

AIMS is Australia's tropical marine research agency. Our purpose is to contribute to the economic and environmental wellbeing of Australians by conducting research into the tropical marine real estate. Since 1972, AIMS has conducted world-class scientific research and development relating to, and to promote, the application and use of marine science and technology. Our mission is to provide the research and knowledge of Australia's tropical marine estate required to support growth in its sustainable use, effective environmental management, and protection of its unique ecosystems.

### 2.2 Our structure

AIMS is a corporate Commonwealth entity under the *Public Governance, Performance and Accountability Act 2013* (Cth). We do not own or control any subsidiary entities, domestic or foreign. AIMS is not associated with any other trading or brand names.

AIMS' registered office is at 1526 Cape Cleveland Road, Cape Cleveland, Queensland, 4810.

AIMS employed an average of 354 full-time equivalent science and support staff during FY 2023-24, including 29 full-time equivalent roles engaged under labour hire arrangements.

AIMS is governed by a Council which reports to the Minister for the Environment and Water. The Council sets AIMS' strategic direction and research strategies and oversees management of the Institute. The Chief Executive

Officer is responsible for managing the affairs of the Institute. The AIMS Audit Committee is a sub-committee of Council with responsibility and oversight to ensure that key risks are managed and governance obligations are effectively discharged.

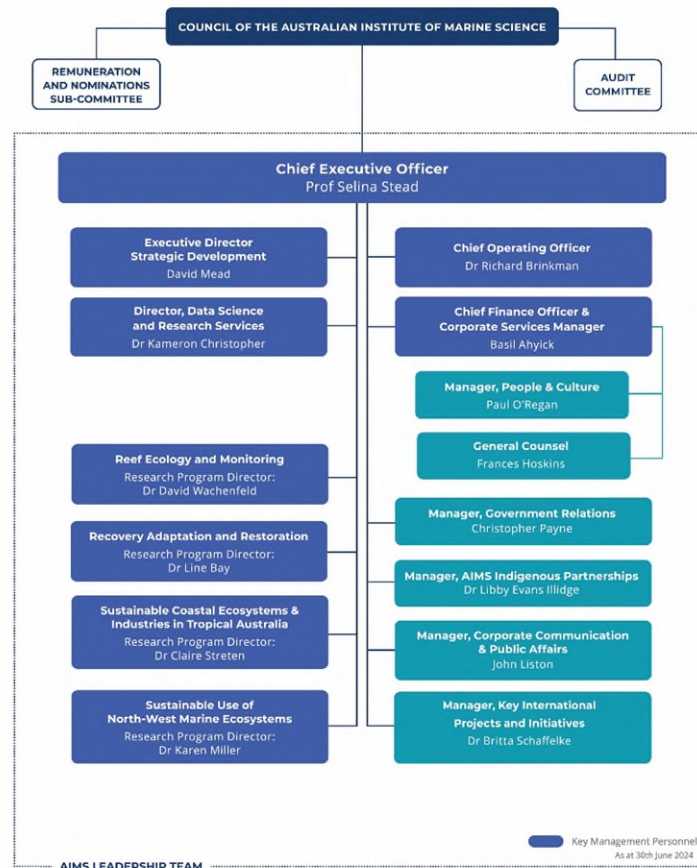


FIGURE 1: OVERVIEW OF AIMS' ORGANISATIONAL STRUCTURE AS AT 30 JUNE 2024

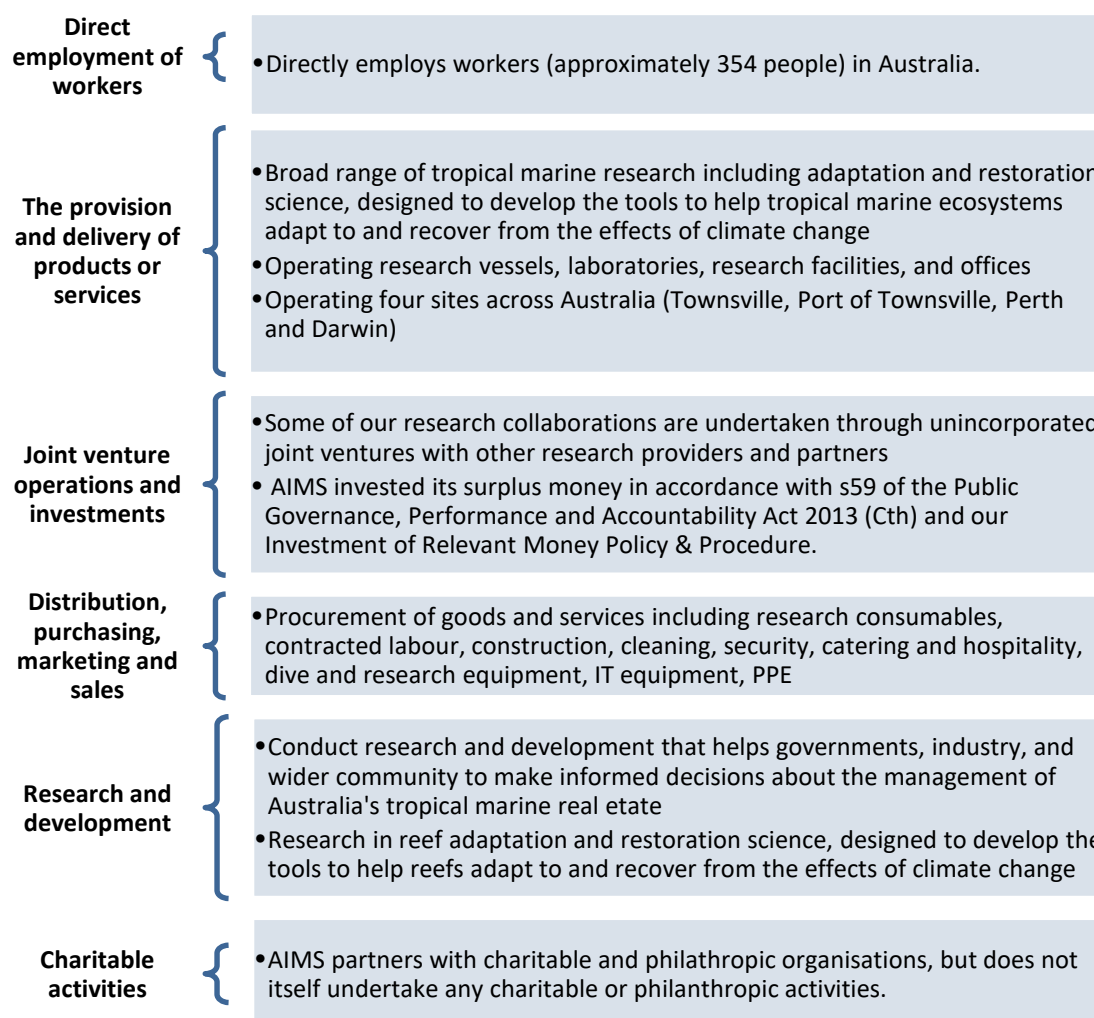
## 2.3 Our operations

Scientific research and development constitute a majority of our operating activities.

AIMS works to deliver research outcomes by providing:

- baseline, status and trend data that are the trusted information base for stakeholder decisions
- more information for stakeholders produced through autonomous and automated technologies and processes
- science that underpins conservation and management of threatened and endangered marine species
- models of environmental condition and function that are used to manage tropical marine ecosystems
- improved tropical marine ecosystem health via AIMS' solutions that mitigate local, regional and cumulative pressures
- future coral reef condition forecasts based on knowledge of recovery, acclimatisation and adaptation

- restoration science and scalable technologies that help coral reefs resist, adapt to, and recover from climate change impacts
- advanced data analysis workflows and knowledge delivery systems that improve stakeholder use of AIMS information and
- decision support tools that are used by stakeholders for management decisions and policies.



**FIGURE 2: OVERVIEW OF AIMS' OPERATIONS**

AIMS has sites around Australia as follows:

### **2.3.1 Main operating sites (research and development centres): Townsville, Darwin, Perth**

Our three main operating sites are home to sophisticated laboratories, research aquaria, operational workshops, extensive collections, and more to support our large-scale, long-term research. We also have a small number of office-based staff in Canberra.

We operate the National Sea Simulator from our Townsville site, the world's most advanced research aquarium. It gives AIMS the ability to simulate, quantify and predict the effect of multiple pressures on marine and coastal ecosystems.

### 2.3.2 Vessel Facility: Port of Townsville

The AIMS Vessel Facility is the home berth and central management location for AIMS' large research vessels. The facility supports our operations with berths, vessel loading capabilities, voyage mobilisation facilities, stores, and office space.

Our research fleet provides access to all of Australia's tropical marine environments.

### 2.3.3 Global partnerships

AIMS also has global partnerships with research institutions, though we do not operate or maintain any international facilities. AIMS partners with governments and organisations to support research and management activities aimed at protecting the tropical marine environment, including coral reefs. This involves AIMS staff travelling overseas to work with local partners, including leading of training activities, as well as international partners travelling to Australia for workshops and collaborations.

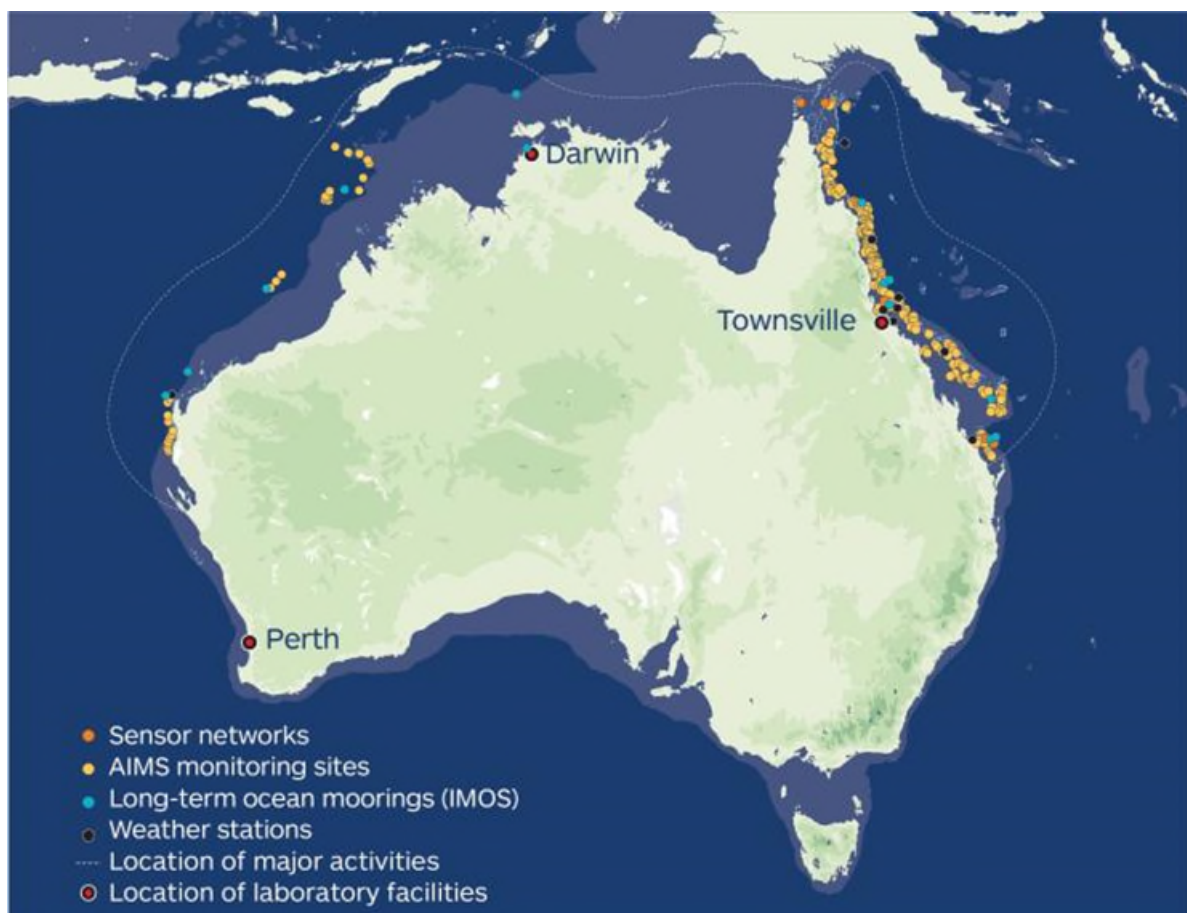


FIGURE 3: AIMS' OPERATING SITES

## 2.4 Our supply chains

AIMS procures a range of products and services to support our main scientific research and development activities. The vast majority of our direct suppliers (Tier 1) by invoiced spend are Australian businesses. We do not



maintain an easily accessible record of the number of direct Australian suppliers we procure goods and services from.

AIMS also procures products and services from 18 overseas suppliers, located in Canada, China, Fiji, Germany, Hong Kong, Italy, Japan, Kenya, Republic of Korea, Monaco, the Netherlands, New Zealand, Philippines, Singapore, Switzerland, the United Kingdom, the United States of America and Vietnam.

Sourcing and procurement primarily occur through AIMS' Supply team, with a smaller proportion of direct purchasing through science and operational teams. Decisions are governed by the Financial and Contract Delegation Policy, and the Procurement Procedures Policy. Higher value procurements must also comply with the Commonwealth Procurement Rules. These impose some limited requirements on purchasing decisions, such as the requirement to obtain verbal or written quotes, or to conduct an open tender process for higher value procurements. Operational areas are generally permitted to undertake purchasing via delegated authority.

Most of our larger supplier relationships are held by the AIMS Operations Team, and primarily constitute long term relationships for specialised equipment and services. Other sourcing as noted does take place through direct purchasing, via delegated authority where science and operational teams often hold ongoing relationships with repeat purchases.

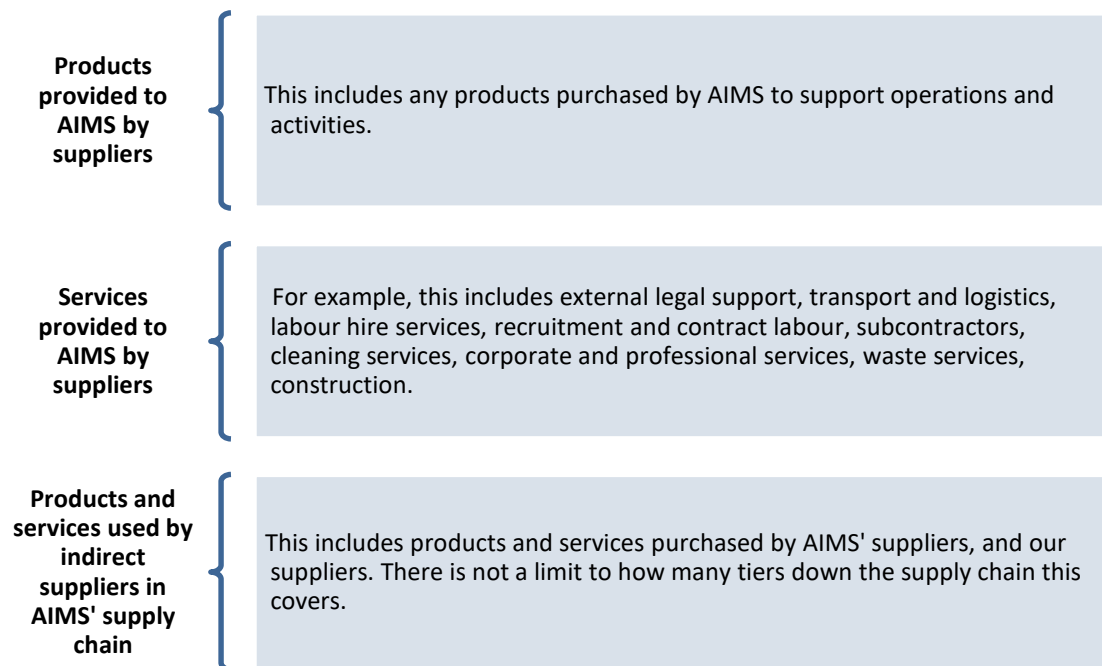
The main types of **goods** sourced directly from suppliers are:

- electronic hardware (e.g., computers, mobile phones, office machines)
- safety equipment (e.g., gloves, masks, other PPE)
- uniforms
- dive equipment (e.g. SCUBA equipment, wetsuits, etc)
- field equipment (e.g. field hardware, sample collection consumables)
- science consumables (e.g., chemicals, laboratory supplies)
- office supplies (e.g. office furniture, stationery)
- vehicle and vessel fuel

The main types of **services** procured are:

- asset and property management services including cleaning, security, catering, facilities management and vessel management
- construction, property repairs, and maintenance
- employee expenses services including laundry, hospitality
- contracting and labour hire (e.g. short term staff, specialist services)
- freight and postal services
- information services (e.g. scientific journals, subscriptions)

We capture some information about the country of supply of the goods and services we purchase, which typically reflects the country from which a good is distributed or imported, as distinct from the country where it is manufactured or produced. At present, we do not compulsorily collect the country of origin for the goods we purchase.



**FIGURE 4: AIMS' SUPPLY CHAIN**

### 3 RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

In this Statement, 'risk' refers to the Act's definition of risk, which considers modern slavery risk in terms of risk to people of experiencing conditions of modern slavery, as opposed to risk to the business. In line the United Nations Guiding Principles on Business and Human Rights (UNGPs),<sup>2</sup> AIMS recognises that we may cause, contribute, or be linked to modern slavery risks as a result of our business operations and relationships.

#### 3.1 Risk assessment approach

This is the second reporting period in which AIMS has met the consolidated revenue threshold in the Act and been subject to reporting obligations.

In 2023, the first reporting period in which AIMS met the consolidated revenue threshold in the Act, AIMS engaged an independent third party to undertake an assessment of modern slavery risks in our operations and supply chain in the FY24 reporting period and beyond. The risk assessment analysed our operations and supply chain spend data to ascertain where our activities may be causing, contributing, or directly linked to modern slavery practices. The quantitative and qualitative analysis in 2023 drew on reputable data sources, such as the Global Slavery Index (GSI),<sup>3</sup> Global Rights Index (GRI) 2023, Trafficking in Persons Report,<sup>4</sup> List of Goods Produced by Child Labor or Forced Labor,<sup>5</sup> and commodity research by Verité.<sup>6</sup> The assessment considered inherent risk factors according to industry, product, country and region.

We recognise that our visibility over some elements of our supply chain is limited, for example we do not require transparency or information about who our direct suppliers source their goods and services from. We recognise that limited transparency and visibility can pose modern slavery risks, as it hinders the accurate assessment of and response to risks.

#### 3.2 Risks in our operations

The risk assessment conducted in 2023 determined that our operations are considered low risk for slavery. This is partly due to AIMS' operations being largely within Australia, which has a low risk of modern slavery practices, and the visibility AIMS has over much of our labour hire and contractor workforce.

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<sup>2</sup> [United Nations Guiding Principles on Business and Human Rights](#), Office of the High Commissioner (2011)

<sup>3</sup> [Global Slavery Index](#), WalkFree (2023)

<sup>4</sup> [Trafficking in Persons Report](#), US Dept. of State (2023)

<sup>5</sup> [List of Goods Produced by Child Labor or Forced Labor](#), US Dept. of Labor (2022)

<sup>6</sup> [Research on Risk in 43 Commodities Worldwide](#), Verité (2017)

Certain industries in Australia carry risks of modern slavery, such as those requiring base skill or entry skill labour, those with a high proportion of vulnerable workers such as migrants, work completed by temporary or casual workers, or work engaged via labour-hire. For context, in 2024 the Global Rights Index ranked Australia as a ‘**3-Regular violations of rights**’ on their 5 point ranking scale that measures the incidence of labour rights violations against the International Labour Organisation’s standards.<sup>7</sup>

**Spotlight: Services engaged via labour-hire or subcontracting** present risks of labour exploitation. Modern slavery risks are higher among workers engaged through recruitment and labour-hire agencies, as these industries can rely on business models that exploit vulnerable workers, such as migrants or student workers. In situations where third-party labour-hire organisations are used, the lack of a direct contractual relationship typically means an organisation has more limited visibility over the worker’s employment conditions. This degree of separation increases the risk of modern slavery practices.

In the current FY24 reporting period, AIMS engaged 75 workers through labour-hire contracting for fixed-term positions for a range of professional and specialised scientific roles (comprising 29 full-time equivalent workers under labour hire arrangements and a further 46 personnel via outsourced functions). These include ecologists, specialist equipment technicians, researchers, accountants, and legal assistants.

The independent risk assessment in 2023 determined that our labour hire activity was low risk for modern slavery due to the employment conditions we impose on our principal labour hire agency. There have been no circumstances in 2024 that would suggest that the inherent risk in our labour activity has increased (noting that AIMS only used one agency during the reporting period). These include conditions in relation to personnel, including requiring that workers are engaged on contracts with terms and conditions equal to that of our direct employees (with the exception of long service leave entitlements), and providing such workers with access to the full suite of employee support services. In addition, the labour hire staff we engage are predominantly highly skilled workers, which lowers the inherent residual modern slavery risk.

### 3.3 Risks in our supply chain

As noted in section 3.1, in 2023 we engaged an independent consultant to undertake a risk assessment. Based on the findings of that risk assessment, our preliminary observations of risks in our supply chain include products sourced from high-risk geographies, and products and services with inherent modern slavery risk.

<sup>7</sup>, [2024 ituc global rights index en.pdf](#) International Trade Union Confederation (2024)



### 3.3.1 Geographic risks

‘Geographic risk’ refers to the inherent risk of modern slavery in the country where goods are made or sourced from. Geographic risk was assessed based on a range of inputs, including the likelihood of forced labour, child labour, labour rights violations, and human trafficking, derived from credible research sources referenced in section 3.1.

Close to 96% of AIMS procurement is from Australian suppliers, which carry a low inherent geographic risk of modern slavery. We recognise however that modern slavery can and does take place in Australia and other overall ‘low-risk’ contexts – we focus on this via category risk analysis.

Of the remaining 4% of spend on direct purchases from international suppliers, three source countries are classified as very high-risk for potential modern slavery risk, and one as high-risk. We also procure products and services from countries with a moderate risk of modern slavery. As the proportion of our procurement spend in these countries is low, the modern slavery risk is assessed to be commensurately low.

Note that this data refers to **country of purchase invoice**, rather than indicating source country. Information beyond Tier 1 suppliers is not readily available. As noted in section 2.4, we do not presently require information about the source country of goods and services purchased to be collected.

### 3.3.2 Category risks: products and services

*Category risk* refers to a procurement category and the risks to people for modern slavery-like conditions within the sector, industry, or products of that category. High-risk purchase categories were identified based on the approach described in section 3.1. The risks described here are the potential risks based on the modern slavery risk profile of that sector or industry. They are general in nature and do not represent specific issues or practices found in AIMS’ services procurement. Understanding these risk areas will allow us to take a risk-based approach and prioritise future due diligence in higher-risk areas.

**Product risks** identified in the risk assessment included the following products, materials, and commodities:

- uniforms
- electronic hardware (e.g. laptops, mobile phones, radios)
- safety equipment (e.g. masks, gloves, other PPE)
- other manufactured products (e.g. science equipment, diving supplies)
- vehicle and vessel fuel
- cleaning supplies

**Service and industry risks** were identified at our operating sites, as AIMS outsources contracted services for catering, cleaning, site and facilities maintenance, and security. Identified service and industry risks included:

- cleaning services
- construction, repairs and maintenance
- contracting and labour hire (e.g. office furniture fit-out, grounds maintenance)
- freight and postal
- security services

- laundry services
- catering and hospitality

**Spotlight: Cleaning services in Australia** is considered a high-risk industry due to the high incidence of documented modern slavery practices, and the high proportion of migrant and contract-based workers. Contracting and sub-contracting arrangements in this sector has the potential to obscure the rights and responsibilities of workers and employers. Workers may be exposed to hazardous chemicals or waste. The Australian Fair Work Ombudsman has found breaches of workplace labour rights laws, fraudulent contract arrangements, illegal underpayment, unreasonably long hours, OH&S problems, poor treatment of workers, and insecure work arrangements.

The risk assessment in 2023 determined that the overall risk of modern slavery in AIMS' contracted cleaning services is low, due to our supplier contract terms giving AIMS a high degree of visibility over the terms on which cleaning and site maintenance workers are contracted. Contracted staff are also available to access the support services available to direct employees of AIMS. AIMS is currently engaged in an open tender process to renew its long-term cleaning services contract and will include appropriate provisions relating to modern slavery in the new contract, as set out in Section 4.4.

## 4 ACTIONS TAKEN BY AIMS TO ASSESS AND ADDRESS THESE RISKS

During the reporting period, AIMS continued to implement relevant existing policies and practices that contribute to mitigating modern slavery risks.

During the reporting period, AIMS did not have in place specific policies or processes relating to remediation. However, we have a whistleblower mechanism through which our employees and the employees of our Tier 1 suppliers are able to raise concerns about illegal and unethical conduct.

In FY25, we will continue to act on the findings of the independent risk assessment conducted, to develop and prioritise specific actions to address our modern slavery risks.

### 4.1 Policies

We did not have dedicated policy frameworks for modern slavery risks in the reporting period. However, we have existing frameworks that govern business conduct and standards.

AIMS has a publicly available **Public Interest Disclosure and Whistleblower Policy and Procedures** that applies to our direct employees, and the employees of organisations who provide goods or services to AIMS (i.e., Tier 1 suppliers). Reportable conduct under this policy includes illegal activity, unethical activity, and conduct that unreasonably endangers health and safety. During the reporting period, AIMS received no reports relating to modern slavery under this Policy. We recognise that a lack of reports received is not necessarily indicative of an absence of reportable conduct occurring throughout our value chain.

If reports are made under the Policy, AIMS follows the process set out in the Policy by:

- assessing whether the report should be processed for further investigation; and
- if the report is processed for further investigation, facilitating that investigation by an independent person within prescribed timeframes.

We have a **Code of Conduct** which establishes the standards of conduct and behaviour that all people working with AIMS must comply with. The Code of Conduct applies to all staff, external contractors visiting or working on AIMS properties, and other third parties that have working arrangements with AIMS, meaning the policy also extends to labour hire workers. Through the Code of Conduct, we communicate our expectations that all our working environments are safe and that all people are entitled to be treated fairly.

### 4.2 Governance and planning

As a Commonwealth entity, we are subject to the Public Governance, Performance and Accountability Act 2013 (PGPA Act) and related rules, in so far as they apply to corporate Commonwealth entities. The PGPA Act and its associated regulations and policies set out the governance, performance and accountability requirements of our operations, including the use and management of public resources.

During the reporting period, AIMS has:

- established a cross-functional working group on modern slavery responsible for oversight of relevant modern slavery workstreams and actions; and
- assigned AIMS Leadership Team responsibility for oversight of modern slavery risks to the Chief Operating Officer.

These were recommendations made by the 2023 independent assessment.

During the reporting period, AIMS has continued to implement its general governance structure for related areas, for example in our approach to managing work health and safety obligations, as outlined in our Health and Safety Policy. Our highest priority is the health and wellbeing of our staff, collaborators, volunteers, visitors and contractors. We operate in challenging environments and undertake activities where active care is required to manage the health and safety of our workers and service providers. AIMS responds to this challenge with an organisation-wide approach to risk management and a relentless focus on developing our safety culture and systems. AIMS Council receives regular (2-monthly) briefings on safety performance and issues, and AIMS Audit Committee reviews health and safety compliance in November each calendar year.

### 4.3 Training

During the reporting period, we conducted specific training on modern slavery for the members of the modern slavery group. This training was designed to develop AIMS' working group members' awareness of modern slavery, its relevance to AIMS, and confidence in identifying the signs of modern slavery in practice.

Over the reporting period, staff also completed relevant mandatory workplace training covering the following areas:

- Code of Conduct refresher
- General Induction including on AIMS values and health and safety obligations.

### 4.4 Procurement process

As noted above in section 2.4, our current procurement process occurs through AIMS' Supply team, with a smaller proportion of direct purchasing through delegated authority. AIMS does not have specific modern slavery due diligence requirements or dedicated tender criteria that apply to most purchasing decisions. At present our suppliers must adhere to our Code of Conduct.

We also conduct limited due diligence on some new suppliers for higher dollar value procurements through a search of formal judicial decisions and other commercial information. If that due diligence identifies that a supplier has been the subject of a formal judicial decision, AIMS seeks more information from the supplier and other publicly available sources to determine whether it is appropriate for AIMS to engage the supplier.

During the reporting period, we have taken steps so that from 1 July 2024 all Suppliers will comply with the Commonwealth Supplier Code of Conduct which includes requirements that they, and all organisations in their



supply chain, are not causing, contributing to or directly linked to human rights abuses such as coercion, involuntary and underage labour or modern slavery practice. In addition, we have included express provisions in key contracts to address modern slavery, using clauses drawn from the Department of Finance guidance on modern slavery<sup>8</sup>.

In the next reporting period, a priority for us will be to complete a review of our procurement policy and processes with the aim of making our procurement requirements and processes better adapted to the risks associated with particular values and types of procurements. In addition to the improvements made during this period to our contracting practices, a priority in the next reporting period will be to introduce additional contractual controls, such as tender criteria or due diligence requirements relating to modern slavery risk.

## 4.5 Employment processes

We conduct some due diligence on new employees. Every employee undergoes an identity check, right to work in Australia check, pre-employment medicals, qualifications checks and in some positions police clearances (based on risk). Other checks such as Working With Children Checks will be conducted where the position requirements demand.

Since 2017, AIMS has worked predominantly with a single labour hire agency. We require workers contracted via this labour hire provider to be offered equivalent working terms and conditions as direct employees of AIMS, with the exception of long service leave entitlements. AIMS provides the relevant conditions of engagement for a specific role (consistent with our Enterprise Agreement), to the agency. AIMS checks payments made to individuals by the agency on a fortnightly basis to ensure appropriate application.

AIMS outsources contracted services for crewing marine research vessels. While seafaring and maritime industries can involve higher risks of modern slavery practices, we determine the risks associated with our research vessels to be low. This is because:

- AIMS owns both of our large research vessels, the RV Cape Ferguson and the RV Solander. Maintenance and operation of these vessels are contracted to Riverside Marine, a wholly Australian owned company.
- AIMS maintains a high degree of visibility over the terms on which vessel crew are contracted. Contracted staff are also available to access many of the support services available to direct employees of AIMS.
- There is a high level of direct engagement of vessel crew with AIMS staff and management (e.g. both vessels have AIMS staff on board for >250 days per annum).

In the reporting period, AIMS Management and staff negotiated the AIMS Enterprise Agreement (2024-2027). The development of the Enterprise Agreement presented a process for fair and transparent staff involvement in defining working conditions such as wages, hours, benefits, and other conditions of employment.

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<sup>8</sup> [Modern Slavery | Department of Finance](#)

## 5 ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

### 5.1 Actions taken in this reporting period

We are subject to internal and external auditing across a range of processes, functions and governance obligations including financial management, assets management, approvals processes, health and safety compliance, and the management of organisational risks more broadly. An annual internal audit plan is developed by and reported upon to the AIMS Audit Committee and an annual independent audit of AIMS financial statements is undertaken as required under the *Public Governance, Performance and Accountability Act 2013* (Cth).

During the period, we have taken the actions set out in Section 4.

### 5.2 Next steps

As described in the previous sections, in 2023 we engaged a third party to undertake a modern slavery risk assessment to ascertain the primary gaps in our controls and risk management practices. AIMS primary activities have remained consistent through this reporting period and the 2023 risk assessment remains a sound foundation upon which AIMS will continue to develop its modern slavery action plans. The findings from the 2023 analysis will continue to inform the actions we prioritise in the coming reporting periods (FY25 onwards) to strengthen AIMS' approach to assessing and addressing modern slavery risks. We have implemented some immediate measures in the current period as set out above.

Priorities include:

- developing a responsible procurement policy that outlines AIMS' standards for ethical purchasing practices including human and labour rights and
- developing a plan to improve our procurement data collection processes, to strengthen our understanding of risk in our operations and supply chain.

In time, we will aim to develop frameworks and processes to review the effectiveness of our actions.

## 6 PROCESS OF CONSULTATION

As AIMS does not own or control any other entities, no external consultation on this Statement was undertaken.

AIMS consulted key internal stakeholders on the development of this Statement.

## 7 COUNCIL APPROVAL

### **Principal governing body approval**

This statement was approved by the AIMS Council in their capacity as principal governing body of AIMS on 10 December 2024.

### **Signature of Responsible Member**

This statement is signed by Selina Stead in her role as the Chief Executive Officer of AIMS on 11 December 2024.



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Selina Stead  
Chief Executive Officer  
11 December 2024



## APPENDIX A: TABLE OF MANDATORY CRITERIA

Criteria	Description	Requirement	In this Statement
1	Identify the reporting entity	Entity is required to identify the reporting entity that is covered by the statement - this includes Entity owned and operated subsidiaries.	Section 2, page 2
2	Structure, operations and supply chain	Entity is required to describe the structure, operations and supply chains of the reporting entity. During this process, the entity should specifically describe what components of their activities and relationships are categorised under own operations and supply chains.	Section 2, page 3
3	Risk of modern slavery in your operations	Entity is required to describe the risks of modern slavery in its activities taken by to organisation. The entity is only required to identify how risks of modern slavery may be present in the entity's own operation; it is not required to report on actual cases of modern slavery. However, the entity can report on specific risks if it wishes to do so or include an anonymised case study	Section 3, page 8
	Risk of modern slavery in your supply chain	Entity must report on the risks of modern slavery in the products and services that contribute to the entity's own products and services sourced in Australia or overseas. This extends beyond direct suppliers. Entity is not required to certify that their supply chain is 'slavery free' but rather, is required to identify how modern slavery practices may be present in their supply chain.	Section 3, page 9
4	Actions taken to address risks	Actions taken to assess and address the identified risks including due diligence and remediation activities; policies, training, reviews, grievance mechanisms etc.	Section 4, page 12
5	Assessing effectiveness	As reporting years progress it is expected each annual statement will address how actions taken are being measured for effectiveness in remedying findings or causes of modern slavery. i.e. is transparency being upheld, spot checks conducted, is media being monitored for alternative information.	Section 5, page 15
6	Consultation	The internal consultation process in preparing the Statement must be described including chain of responsibility.	Section 6, page 16

## APPENDIX B: LIST OF AIMS' REGISTERED OFFICES

Name	Country	Registered address
Townsville	Australia	1526 Cape Cleveland Road Cape Cleveland QLD 4810
Darwin	Australia	Arafura Timor Research Facility 23 Ellengowan Rd Brinkin NT 0810
Perth	Australia	Indian Ocean Marine Research Centre Level 3 The University of Western Australia Fairway Crawley, WA 6009