

MÉDECINS SANS FRONTIÈRES AUSTRALIA LIMITED

ACN 068 758 654

**MODERN SLAVERY STATEMENT
2024 REPORTING PERIOD**

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This Statement was approved by the Board of Médecins Sans Frontières Australia Limited on 18 June 2025.

It is signed by a duly authorised person pursuant to the Act's requirements.



Katrina Penney

Board

President

18 June 2025

1. INTRODUCTION

This is Médecins Sans Frontières Australia Limited's (**MSFA**) fourth Modern Slavery Statement based upon the 2024 reporting period. It addresses the mandatory reporting criteria under the *Modern Slavery Act 2018* (Cth) (**the Act**). In addition to MSFA, this Statement also covers the entity, Médecins Sans Frontières New Zealand Charitable Trust (**MSFNZ / the Trust**) (**Charity Number 53189**).

MSFA remains committed to continuously improving transparency of modern slavery risk relating to our operations and supply chains, better equipping us to effectively address these risks. Based upon our unwavering commitment to act ethically and operate responsibly; we are resolved to engage with suppliers who are similarly committed.

Throughout the Reporting Period, MSFA has continued to implement measures to address potential areas of elevated modern slavery risk.

a. CONSULTATION, REVIEW AND APPROVAL PROCESS

As an integral part of its preparation and finalisation, this Statement has been reviewed by MSFA's Executive Leadership Team, and several Board Committees (Environmental, Social, and Governance Committee; and Finance, Risk, and Audit Committee).

Following this internal review process, a recommendation for formal approval was provided to the Board of Directors and duly adopted. The breadth and scope of MSFNZ was considered, in relation to the contents of this Statement, as well as MSFA's overall modern slavery response.

MSFA ongoing evaluation of potential linkages to elevated modern slavery risk because of the shared functions governed by the Services Agreement is also representative (or inclusive of) MSFNZ, given our Australian and New Zealand entities.

2. MSFA - ORGANISATION OVERVIEW

a. STRUCTURE, OPERATIONS & SUPPLY CHAINS.

Médecins Sans Frontières (MSF) is an international network of not-for-profit entities, providing independent humanitarian medical assistance to people affected by conflict, epidemics, disasters, or exclusion from healthcare. MSF operates as a movement in more than 70 countries around the world (**the Movement**).

The Movement consists of MSF International, 24 ‘sections’, 18 ‘branch offices’, and additional satellite organisations (**Entities**), all supportive of our humanitarian medical aid work.

The Entities are guided by medical ethics and the principles of impartiality, independence and neutrality. All entities are bound in a shared vision, underpinned by the MSF Charter and governing mechanisms. All Entities are also expected to adhere to the **La Mancha Agreement** and **the Chantilly Principles**.

Founded in 1994, MSFA stands as one division of the 24 *Médecins Sans Frontières* sections. MSFA is an independent charity registered with the Australian Charities and Not-for-Profits Commission (ACNC). Structurally, it is incorporated as a public company limited by guarantee under the *Corporations Act 2001* (Cth), and is principally based and registered in Sydney, New South Wales.

The MSFNZ Charitable Trust operates as a ‘branch office’ of MSFA since March 2016, through incorporation under the *Charitable Trusts Act 1957* (NZ). MSFNZ’s creation occurred as part of a broader plan to expand the Movement’s capacity for mobilisation, and for the provision of aid wherever it was most needed around the world.

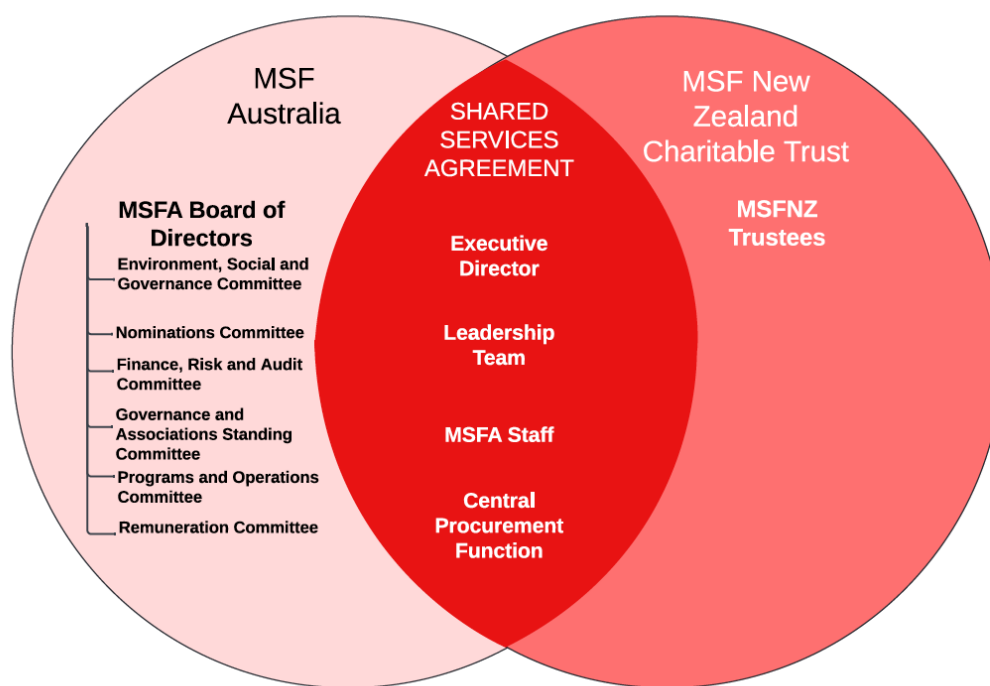
As of 2024, MSFNZ has four sitting Trustees, all of whom were appointed by the Board of MSFA.

MSFA has, to date, managed and administered much of the Trust’s activities under a **Shared Services Agreement**. This arrangement facilitates, among other things, a centralised procurement function, shared staff resources that are reasonable and in the best interests of both entities, ensuring all joint IT platforms and materials are not compromised.

The Board are elected by the MSFA member cohort (known collectively as **the Association**), which consists of past and present MSF international and office staff from Australia and New Zealand. The Board governs and takes responsibility for the actions of MSFA.

The Board delegates day-to-day operational management and decision-making to the Executive Director and the LT whilst maintaining provisional oversight. The Board also

delegates some of its functions to Board Committees. The diagram below illustrates a general overview of the delegation of management between MSFA and MSFNZ:



Operations

MSFA's core operational functions involves:

- recruiting individuals residing in Australia or New Zealand who are eligible to work, for deployment as internationally mobile staff in MSF projects worldwide.
- charitable fundraising from the Australian and New Zealand public to finance the medical humanitarian operations of the MSF Movement. MSFA manages fundraising activities in New Zealand for MSFNZ under the Services Agreement.

Most funds raised are used in medical humanitarian programs run by the MSF Geneva and Paris Operational Centres. These Centres deliver essential medical service programs in more than 55 countries worldwide, often through collaborating with individuals and other humanitarian organisations to seek or provide operational support or funding for overseas humanitarian relief efforts.

A snapshot of key operational activities run by MSF Operational Centres includes:

- Medical expertise in women's health, child health and sexual violence care, including through direct visits to MSF medical humanitarian projects overseas and provision of technical support and oversight; and

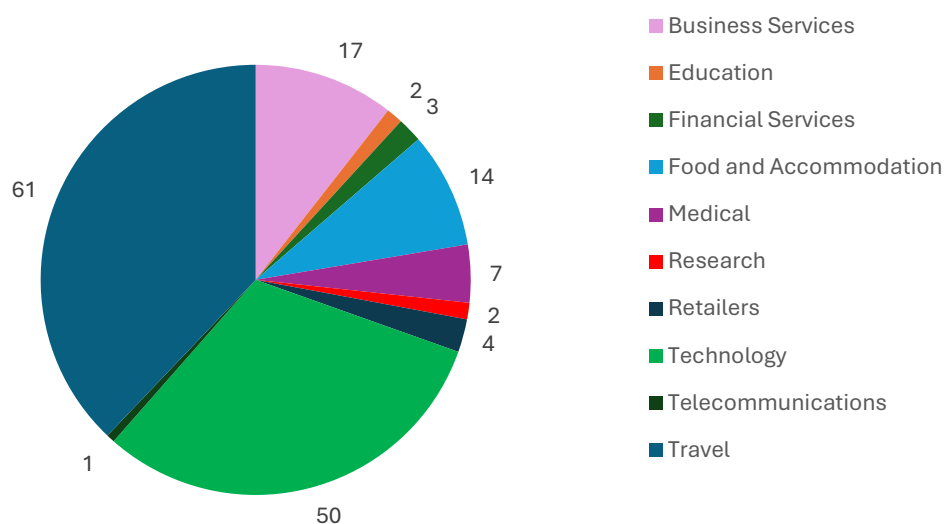
- Training and readying MSF staff for select programs, which includes medical training, medico-operational research, medical communications, and medical policy development.
- Participation in the international MSF Movement's international projects, including through financing international operations and recruitment of humanitarian relief workers, and supporting various Australian and international training courses for these team members and undertaking evaluation missions for international projects.
- A variety of community engagement initiatives such as distributing public information on humanitarian and development issues (via materials and spokespeople, and through print and electronic media) and participating in seminars, public events, and guest lecturing at educational institutions.

During this Reporting Period, MSFA directly employed 255 individuals, divided between 120 local office staff (as at 31st December 2024), and 135 international mobile team members who worked in various locations abroad over course of the reporting period. MSFA's head office in Sydney employs 120 staff (102 full-time positions and 18 part-time positions).

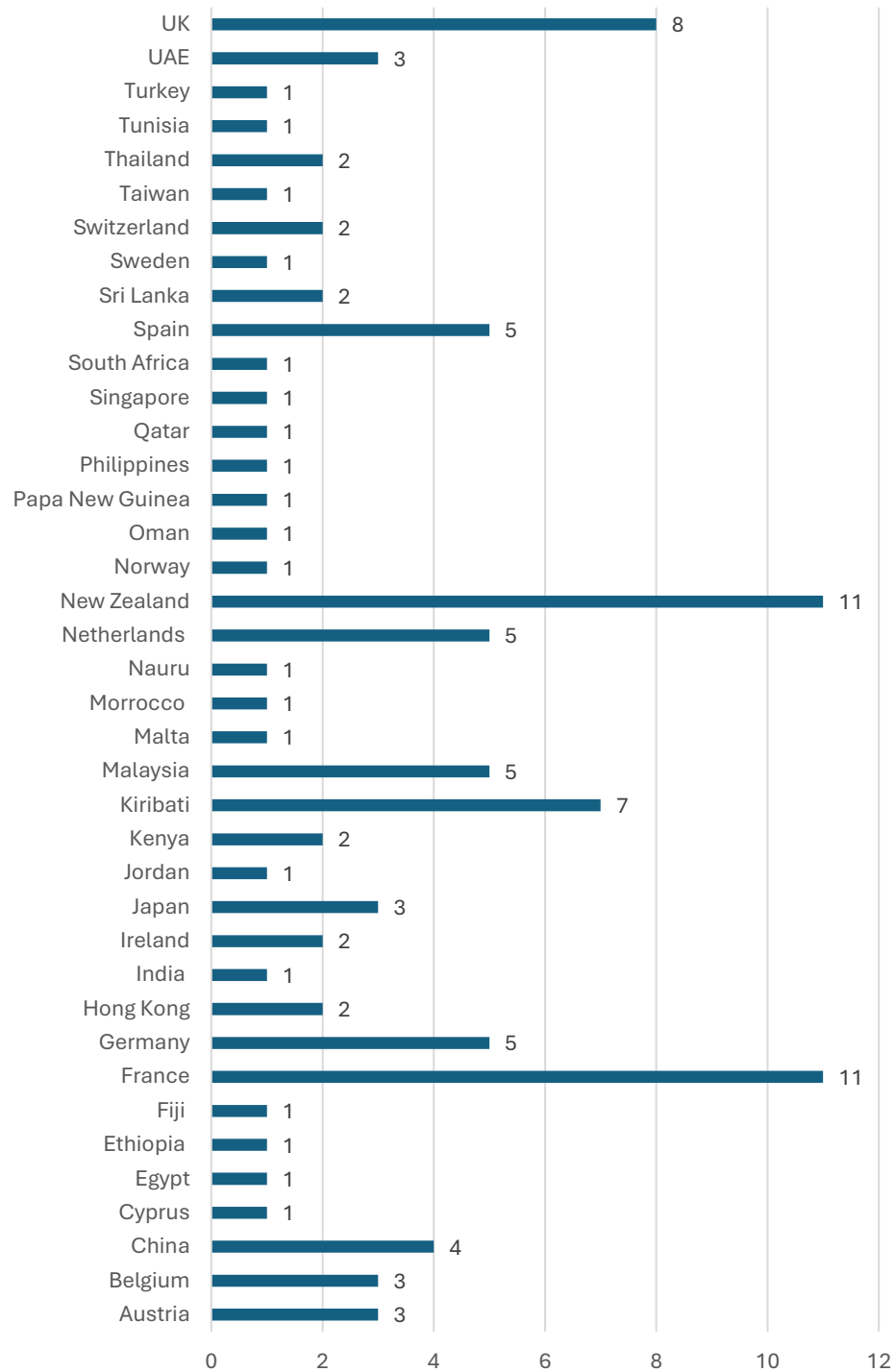
Supply Chains

MSFA engaged with 466 unique suppliers during the reporting period. Whilst, as previously described, MSFA's core suppliers are predominantly based in Australia and New Zealand, this year's Statement provides improved transparency in its descriptions of direct engagement with 161 international suppliers, as summarised in the following charts:

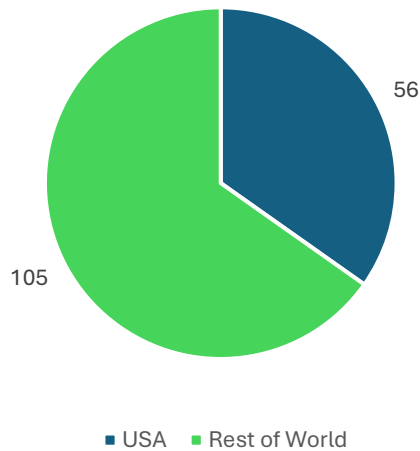
Suppliers by Sector



Suppliers by country excl USA



US suppliers v Rest of World suppliers



Our core procurement activity remains generally consistent across reporting periods, with MSFA obtaining goods and services across three broadly defined categories, each with various intersecting sub-categories. The following table continues to provide an accurate overview of key spend categories.

Fundraising	Regular Giving Program Outsourced Face-to-Face Fundraising and tele-Fundraising services	International Projects
	Appeals Design, printing, mail house, postage services	
	Digital Media buying and other marketing services	
	Communications & Marketing Design, printing services	
	Advertising Creative, print services	
Business Operations	Data Database support, data analysis services	
	Apparel T-shirts, stock	International Projects
	Intercompany Financial Grants To MSF Operational Centres	
	Direct International Project Costs Accommodation, materials	
	Employment Costs Salaries and wages, training, health & wellbeing	
	Insurance Premiums	
Business Operations	Travel Air travel, accommodation	
	Professional Services Audit services, legal services, translations, IT consulting services	
	Systems and Support Licensing, systems support	
	Property Rent, electricity, cleaning	

MSFA is in constant collaboration with our interdependent MSF Operational Centres, including for the provision and distribution of grant funding, and the recruitment of Australian and New Zealander team members. MSFA-distributed grant funds aid initiatives for medical and humanitarian purposes, which are then administered through these Operational Centres.

3. IDENTIFYING & ASSESSING POTENTIAL AREAS OF MODERN SLAVERY RISK

a. SUPPLY CHAINS

MSFA did not receive any allegations or reports of actual or suspected incidences of modern slavery within our suppliers and supplier network during the reporting period during the 2024 reporting period.

Grounded in a robust framework of risk indicators recommended by expert bodies, including the Global Slavery Index (GSI), for the second year running, our comprehensive supply chain risk assessment incorporated advanced analytics from platforms like the Fair Supply dashboard.

A key area of continuous improvement in MSFA's approach to modern slavery risk identification and assessment for the reporting period was that last year, MSFA only assessed suppliers with a total procurement spend over \$10,000. This reporting period, MSFA expanded its comprehensive supply chain risk assessment to all supplier's (with no minimum spend threshold) to gain a more holistic picture of areas of potentially elevated risk exposure.

MSFA undertook modern slavery risk assessment that utilised Fair Supply's proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers all the way to Tier 10 suppliers of the supply chain of our suppliers by spend. The risk assessment approach uses a balanced, global Multi-Regional Input-Output (MRIO) table to perform the supply chain mapping, which links supply chain data from 208 countries, and 37,318 unique industry/country combinations. Fair Supply's data universe comprises over 35,000 local industries categories, which represents more than 98% of global GDP. The MRIO is regularly updated and draws from the most comprehensive and credible global data inputs available, including the United Nations' (UN) System of National Accounts; UN COMTRADE databases; Eurostat databases; the Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and official statistical data from many national agencies worldwide, including the Australian Bureau of Statistics.

The synthesis of global economic supply chain data is overlayed, via a proprietary algorithm, with the best available research and estimates of modern slavery incidences at the national and industry levels, including the Walk Free Foundation's Global Slavery Index (last updated in May 2023); the International Labour Organisation's Global

Estimates of Modern Slavery; official reports published by the United States on International Child Labour, Forced Labour and Human Trafficking, and internally developed database of modern slavery risk factors by country and sector.

One of the key results from the risk assessment was to flag the following suppliers who were characterised, based on industry and location-based risk factors, to have an elevated inherent risk exposure:

Supplier industry and location (Number of suppliers engaged by MSFA)
Ethiopian Air transport (1)
Kiribati travel and accommodation (2)
Papua New Guinea air transport (1)
Indian air transport (1)
Sri Lanka accommodation (1)
Kenya travel and business services (2)
Philippines air transport (1)
Malaysia accommodation (1)
Hong Kong biomedical (1)

In terms of a domestic risks within Australia, a major non-recurring procurement area was MSFA's new office fit out at 700 Harris Street, Ultimo. Our specific engagement and response on the issue of commercial building management, including the higher risk category of professional cleaning services. This non-recurring expenditure was a contributing factor to "Australian business services" being flagged as an area for potentially elevated risk exposure, including through factors such as a higher proportion of the workforce being comprised of temporary migrant workers, who are inherently more vulnerable to exploitation through deceptive recruitment and forced labour practices.

This case study is discussed in Section 4 of this report and is reflective of the strength of our procurement processes that this risk was identified and responded to. Our procurement approach and staff training identified in section 4 are key mitigations to the risk of engaging with services that exploit their workers.

Kiribati Hotel and Restaurant services

A relatively new feature this reporting period for MSFA's overall supply chain was the ongoing work of our Kiribati project (which, as reported in last Statement, commenced

in 2023). A focal point of this work is travelling to eight outer islands (The Southern Gilbert Islands) to support in the detection and management of non-communicable diseases related to maternal health. Other activities focus on working to improve newborn care in the first 24 hours of life, through training local staff in the Helping Babies Breathe (HBB) program.

MSF is also helping with a hospital infrastructure upgrade for the hospital on the Southern Gilbert Island of North Tabiteuea, including refurbishing the maternity and sterilisation rooms and working to improve the waste management system for the hospital.

At a procurement level, our work in Kiribati requires MSFA to purchase staff accommodation and air travel to Kiribati. This location is recognised in the Walk Free Foundation's 2023 Global Slavery index as one of the Pacific Islands already experiencing the impact of climate change, direct extract below:

"In atoll countries... such as Kiribati and Niue, permanent relocation as a coping strategy for climate change has been on the political agenda for more than a decade. Across the Pacific Island countries, risks created by environmental hazards increase as intensifying weather events and rising sea levels lead to greater food and water insecurity, crop loss, loss of arable land, overcrowding, poor health and sanitation, and increased competition for limited jobs. These conditions create opportunities for traffickers to exploit vulnerable individuals, particularly where avenues for regular migration are not readily available. Women and girls with limited land rights are particularly vulnerable in these situations because they already face discrimination and become at greater risk of exploitation, particularly forced commercial sexual exploitation"

This inherent (and increasing) geographic vulnerability combines with risks in the global hotel and accommodation sector, with use of low skilled and potentially subcontracted employees such as cleaners, hospitality workers and gardeners. Hotels and accommodation also have relatively higher risk supply chains, being reliant on high-risk food and beverage products and textile products for linen.

Ethiopian air transport services

The global aviation sector is essential to efficiently facilitate the work of MSF and includes suppliers engaged to transport MSF staff to high-risk locations. The 2023 Global Slavery Index national estimates for Ethiopia are 6.3 individuals per 1,000 are living in modern slavery. This puts Ethiopia amongst the top 15 most affected countries in the African region in terms of overall modern slavery prevalence.

The air transport sector is also characterised by potentially elevated modern slavery risks, including through:

- Ground handling, cleaning, and catering services, which are often outsourced and staffed by low-wage or informal workers.
- Airport construction and maintenance, where subcontracting practices, lack of formal labour oversight, and temporary contracts heighten vulnerability to forced labour and exploitative working conditions.
- Supply chain reliance on an array of high-risk products, such as fuel, food and beverages, complex electronic inputs, and key metals such as aluminium and steel, which are often refined in high-risk locations.

Increased rigour and transparency over travel decisions is important to address modern slavery risks. MSFA is moving to a new travel supplier which provides more transparency over decisions made with respect to suppliers and routes chosen.

Medical equipment and PPE – Procurement through MSF Operational Centres

MSFA recognises that medical equipment and personal protective equipment supply chains are global industry sectors that have elevated modern slavery risks. These range from the manufacturing of rubber gloves and surgical face masks to the extraction of metals and minerals used to manufacture surgical instruments.

Whilst such equipment is unquestionably an important feature of our provision of on-the-ground medical services to those facing humanitarian crises of various kinds, it is important to appreciate that MSFA does not exercise control over the purchasing decisions of the MSF Operational Centres, where such procurement is more heavily concentrated, although it is using its own procurement function to work with the MSF central procurement team to enhance the rigour of its procurement decisions.

b. OPERATIONS – including Grants and Staff

Consistent with MSFA's approach in previous Statements, we consider the identification of potential operational modern slavery risk to be most appropriately separated between our core grants function and consideration of MSFA's entire workforce.

GRANTS

The year's comprehensive risk assessment (as described above in relation to MSFA's supply chains) also included the intercompany transactions made from MSFA to operational centres.

MSF Operational Centres continue to be located across five European and one African country. A significant portion of expenditure for MSFA is delineated to grants and funding of Operational Centre projects in Paris and Geneva. Grant distribution to these major European Centres is then typically used to fund medical humanitarian aid operations worldwide. The use of MSFA funds remains subject to each Operational

Centre's international practices and procurement process and protocol. Executive decision making regarding the ultimate use of MSFA allocated funds is not vested in MSFA. As such, MSFA maintains oversight, but does not exercise determinative control in relation to the products and services that Operational Centres procure with MSFA provided funding.

Our Operational Centres which receive funds from MSFA are, in effect, not within the scope of MSFA's modern slavery response framework due to the internal MSF global structure and their international location.

However, MSFA has provided funds to the Paris and Geneva Operational Centres for many years and through our strong and continuous relationship we have a high degree of confidence in all their decision-making processes, including in relation to ethical procurement to mitigate modern slavery risk.

Whilst MSFA has limited oversight over procurements undertaken by the OCs, it is using its own procurement function to work with the MSF central procurement team to enhance the rigour of its activities, including its Consultancy Guidelines, and within its Sustainable Procurement approach which focuses on ensuring:

- that our **suppliers** operate in a manner that does not exploit workers or harm the environment.
- we **select products or services** that have a reduced environmental impact throughout their entire lifecycle, compared to conventional alternatives.

STAFF (INTERNATIONAL WORKERS & OFFICE STAFF)

MSFA recruits individuals residing in Australia or New Zealand who are eligible to work, for deployment as internationally mobile staff in MSF projects worldwide.

These international staff are employed by MSFA under an Australian contract and work on humanitarian projects run by five of the six MSF Operational Centre partners (Belgium, France, the Netherlands, Spain, and Switzerland).

These five Operational Centres are committed to remaining in compliance with: a) their respective national laws concerning Modern Slavery; and b) any EU regulations and directives that may be applicable to their operations at any given point in time.

The majority of MSFA's office staff are employed in Australia and their employment is governed by the *Fair Work Act 2009* (Cth).

MSFA carries out external reference checks on new staff, regardless of contract duration, irrespective of their nature of engagement, as international project staff or domestic office staff.

Where MSFA engages external consultants, they are contracted on a case-by- case basis, and the consulting engagements are subject to applicable Australian legislation.

Our recruitment processes are underpinned by right-to-work checks, mandatory for all prospective MSFA employees. This abates the risk of human trafficking and Modern Slavery. Our Recruitment Policy is designed and applied with the aim of ensuring all hiring decisions are fair and equitable. All positions are subject to appropriate and applicable Police Criminal History and Working with Children Checks.

4. ACTIONS TO ADDRESS MODERN SLAVERY RISK

a. OVERVIEW OF KEY ACTIONS IN 2024

Updating and improving MSFA's Procurement Practices to more fully integrate modern slavery risk considerations

In last year's Statement, MSFA described the initial stages of our journey to overhaul and integrate modern slavery risk considerations into the general procurement processes, which were being implemented in the context of MSFA's wider business transformation.

This continued into the 2024 reporting period, including through the implementation of the following new measures:

- Introduction of standard procurement MSFANZ Risk Assessment form which incorporates Modern Slavery questions
- Updates to MSFA Procurement Policy – formally integrating provisions specifically relating to modern slavery into the Policy
- Updates to MSFA Supplier Code of Conduct
- As standard practice, a binding clause relating to modern slavery issues is now incorporated into all MSFA written supplier contracts.

MSFANZ Risk Assessment Form

As a new initiative from the reporting period, this Form must be completed by suppliers during the Request for Proposal (**RFP**) process. Procurement contracts with a value of \$100,000 or more are automatically considered high risk, and an internal assessment may characterise the risk differently. The form requires disclosure of information relating to modern slavery risk mitigation including:

- Confirmation of pre-existing organisational compliance with anti- modern slavery laws and the *Modern Slavery Act 2018* (Cth) (for mandatory reporting entities).
- Provision of information to confirm organisational implementation of and compliance with, appropriate Modern Slavery Policies, due diligence measures, and internal staff training on modern slavery and human trafficking.

Updates to MSFA Supplier Code of Conduct

MSFA's Supplier Code of Conduct (**Code**) is applicable to "service providers, contractors, manufacturers, vendors and their employees, agents, and subcontractors". The Code was expanded and updated during the reporting period so that it now contains express prohibitions against modern slavery, human trafficking, forced labour and child labour. All suppliers are required to agree to abide by the Code as part of the contracting process.

The Code now contains positive obligations for suppliers to ensure labour and workplaces promote freedom of association, adherence to the ILO standards on wages and international human rights laws.

Suppliers under the Code agree to be transparent with MSFA about the labour conditions under which products are made and services provided to MSFA and to cooperate with MSFA and/or its auditors as may be reasonably necessary.

Other updated provisions of the Code include supplier expectations to:

- Prohibit and reject, under all circumstances, behaviour that exploits the vulnerability of others, in the broadest possible sense (sexual, economic, social, etc.).
- Actively address the risk of modern slavery within their operations and supply chains, including through:
 - conducting regular assessments to identify and mitigate the risks of modern slavery, documenting any actions taken and improvements made;
 - ensuring transparency, which includes upon MSF's request, providing MSF with detailed reports on the measures implemented to combat modern slavery;
 - where requested, collaborate with other stakeholders, including NGOs, government bodies, and communities, to amplify the impact of anti-slavery initiatives;
 - provide training and awareness programs to employees and supply chain partners; and
 - to recognise and report potential indicators of modern slavery.

Modern Slavery Due Diligence in Practice – A Case Study of MSFA's Office Relocation and Commercial Cleaning Contracts

With MSFA's awareness that professional cleaning services is an industry sector in Australia with relatively elevated modern slavery risks, the opportunity to implement active risk mitigation arose when we relocated to a new office during the reporting period. A specific clause was negotiated and incorporated into the commercial leasing

agreement, to ensure that the Landlord provides MSFA with details of the cleaning contractor engaged for the office and facilitate completion of MSFA's modern slavery assessment.

Rollout of comprehensive internal training program

A significant development for the reporting period was MSFA's development and implementation of an organisation-wide modern slavery e-learning module. The training focuses on:

- Modern slavery awareness, including an overview of modern slavery practices and indicators.
- Legal context of modern slavery in Australia including criminal penalties and the *Modern Slavery Act 2018 (Cth)*.
- Interactive scenarios for spotting the signs of modern slavery and addressing risks with suppliers (including recruitment due diligence, and spotting risks using the practical example of a professional office cleaning service provider).
- Roles and responsibilities of employees in addressing modern slavery and reporting any concerns.

The training module was integrated into onboarding processes for all new employees and must be completed within a week of commencement. The module features an assessment component to test user's understanding of the material.

Our focus on internal capacity building and awareness raising continued beyond the conclusion of the reporting period. In February 2025, MSFA's Legal, Risk and Compliance Department delivered a staff-wide interactive seminar, which covered the following key topics:

- Key features of the most common forms of modern slavery practices
- Global and domestic estimates of modern slavery prevalence
- An overview of the indicators of forced labour
- Overview of MSFA's obligations as a reporting entity and the entity's approach to responding to modern slavery risks
- Guidance about support services for victim survivors in Australia

Modern Slavery Due Diligence in Practice – A Case Study of MSFA's Updated Travel Policy

In implementing the results of MSFA's more comprehensive risk assessment, MSFA has responded to the clearly identified area of potentially elevated modern slavery risks associated with international air travel providers.

Non-preferred providers have been determined, and MSFA has updated its official Travel Policy to require air travel to be booked with active consideration that prioritises appropriate supplier selection of humanitarian airfares for international flights.

b. GOVERNANCE, POLICY and PROCEDURAL FRAMEWORK FOR ONGOING MODERN SLAVERY RESPONSE

The Board continues to maintain responsibility of oversight for MSFA's response to potential modern slavery risks in our supply chains and operations. Our governance framework remains consistent with the descriptions provided in last year's Statement.

The Expanding Role and Leadership of MSFA's ESG Committee

An area of continuous improvement has been the further expansion and increased internal significance of the ESG Committee, building upon the Committee's formation and initial progress throughout 2023.

The ESG Committee continues to develop objectives and performance yardsticks that specifically relate to modern slavery issues. This reporting period, the ESG Committee gained more Board Members, increasing the extent of "top-down" leadership driving our modern slavery response, with a larger proportion of the Board being actively involved in decision-making relating to modern slavery issues, including developing and updating policies that are approved at the Board level.

In terms of overall governance procedures of our modern slavery response and reporting, Board oversight is achieved through receiving updates from the Legal Risk and Compliance Department.

Other relevant governance features have been described in previous Statements and are included here in brief summary form.

The MSFA Board must comply with the External Conduct Standards set forth by the ACNC. The potential impacts of organisational decisions on vulnerable individuals susceptible to exploitation must be carefully considered, adding an additional layer of regulatory accountability to endorsed actions.

Face-to-Face Fundraising Services

MSFA remains committed to ensuring that our Face-to-Face Fundraising services are administered in a way that is ethical, respectful of the rights of workers, and otherwise upholds the universal protection of human rights that MSF stands for.

As part of our Fundraising Supply Chain Governance Strategy, we conduct a rigorous supplier due diligence process. This includes requirements that our suppliers be accredited by the Public Fundraising Regulatory Association and commit to adhering to our Fundraising Supplier Code of Conduct and Supplier Responsibility Standards Statement, which address fundamental issues including labour and human rights.

5. HOW MSFA MEASURES THE EFFECTIVENESS OF OUR MODERN SLAVERY RESPONSE:

MSFA believes that one important feature of measuring the effectiveness of our modern slavery response is ensuring continuity and transparency between reporting periods, with particular attention being given to describing the actual progress made on measures we flagged as planned actions for this reporting period in last year's Statement. The following Table provides a comparative overview:

Planned Action	Progress in 2024
Iteratively improve mechanisms for reporting concerns related to Modern Slavery, ensuring clarity and efficiency for stakeholders and responders.	Completed Procurement procedures and templates continue to be improved to ensure great oversight and transparency relating to new suppliers that are selected and onboarded. Adding information to the supplier code of conduct increases onus on suppliers to report concerns.
Conduct targeted campaigns and training sessions to identified stakeholders, to raise awareness about the available grievance and whistleblower mechanisms	Partial completion Review undertaken of the grievance and whistleblower policies in early 2025 with new more robust reporting processes available through neutral third parties. This is in addition to achieving satisfactory levels of baseline internal modern slavery awareness and education (see below).
Launch modern slavery training via the ELMO platform, ensuring all new hires complete it, and that select key personnel (those involved in high levels of procurement) complete the training by the end of Q4 2024	Completed Modern slavery training was successfully implemented into the ELMO Platform, providing for a mandatory Modern Slavery training module, included in our onboarding process for all new starters and employees.
Assess the effectiveness of prior training modules through comparative analysis with the new modules, collaborating with L&D to ensure a best practice approach to wide-scale awareness building, with updated all-staff training seminar from General Counsel.	Completed Office Wide intensive Modern Slavery training rollout took place, with a focus on increasing organisational capacity to be practically equipped in identifying, managing and mitigating modern slavery risks.
Conduct a gap analysis of current ESG practices (including modern slavery issues) against leading sector benchmarks to identify areas for improvement	Ongoing No significant progress during the reporting period. However, the active consideration of ESG issues (including modern slavery) within high-level decision making at MSFA was

	increased (see Governance descriptions above).
Integrate key performance indicators (KPIs) into the ESG Operational Committee members' personal performance framework for 2024, to assist progression of key issues, including modern slavery, and to ensure the prioritisation of ESG within MSFA.	Completed KPI's and clear deliverables were successfully integrated into the ESG Operational Committee members performance parameters.
Evaluate the impact of the enhanced ESG focus on the organisation's overall modern slavery risk profile.	Completed Enhanced ESG governance and focus within MSFA has achieved heightened visibility of the risk mitigation measures, whilst also confirming that suppliers are fully compatible with MSFA's strict anti-slavery position.
Gather feedback from procurement staff and suppliers on the implementation of MSFA's modern slavery policy, procedure and broader action, including identifying areas for improvement.	Completed A key outcome of this process has been establishing a better foundation for heightened supplier assessment, including to enable improved supplier monitoring at all stages of the procurement lifecycle.
Assess methods to strengthen protections for reported concerns, to foster a safe and supportive environment, with emphasis on confidentiality and protection against retaliation.	Completed (post period) Review undertaken of the grievance and whistleblower policies in early 2025 with new more robust reporting processes available through neutral third parties. This is in addition to achieving satisfactory levels of baseline internal modern slavery awareness and education (see below).
Ensure an ESG-literate approach to commercial contracting, embedding Modern Slavery risk assessment as a key indicator of supplier viability.	Completed Our standard supplier assessment form now expressly addresses modern slavery issues, active consideration of potential risk areas now occurs from the initial stages of supplier engagement.
Draft and approve revised Procurement Policy and provide training to ensure consistent implementation across the organisation.	Completed The Procurement Policy was updated to include a Modern Slavery Clause.

6. PLANNED FOCUS AREAS FOR NEXT REPORTING PERIOD & BEYOND

As described in the Measuring Effectiveness section, above, MSFA is cognisant of the few areas in which we did not fully achieve planned action during the reporting period,

which were flagged in last Year's Statement, and which will be prioritised for the 2025 reporting period to be completed by 31st December 2025.

Nonetheless, MSFA believes it remains important to publicly describe our planned focus areas for the upcoming year as additional relevant information in our overall approach to reporting under the Act. These include, all of which will be ongoing activities for improvement within 2025:

- **Internal training and awareness:** MSFA will continue to facilitate regular awareness and education campaigns to ensure our workforce (including contracted staff) are equipped to administer modern slavery related functions and processes linked to their roles.
- **Due diligence and risk assessment:**
 - Further integrate modern slavery considerations within MSFA's procurement processes, including during ongoing supplier management and end of contract performance review.
 - Continue comprehensive supplier risk assessment and utilise results to inform procurement decisions.
 - Work with the IO Procurement function to improve visibility across international purchasing practices.
- **Supplier engagement:** Continue to work with suppliers as is feasible, with elevated risk exposure, including reviewing leverage to engage with overseas suppliers.
- **Governance and Policy:** Continue to mature our ESG committee and Board capabilities, including through delivery of tailored modern slavery training sessions.
- **Grievance mechanism:** Train staff on the new revised Grievance Policy and Whistleblower Policy.

7. KEY SUPPORTING DOCUMENTS

- **Grievance Policy**
- **Whistleblowing Policy**
- **Travel Policy**
- **Procurement Policy and Procedures (with associated templates Supplier Form, Procurement Risk Assessment, Supplier Code of Conduct)**
- **Mandatory Staff Training Materials**