



JOINT MODERN SLAVERY STATEMENT

Under the *Modern Slavery Act 2018* (Cth)

QUEENSLAND COUNTRY BANK

Queensland Country Bank Limited
ABN 77 087 651 027

QUEENSLAND COUNTRY HEALTH FUND

Queensland Country Health Fund Limited
ABN 18 085 048 237

Reporting Period: 1 July 2021 – 30 June 2022



This Joint Modern Slavery Statement has been prepared and lodged by Queensland Country Bank ABN 77 087 651 027 and Queensland Country Health Fund Ltd ABN 18 085 048 237, including on behalf of its wholly owned subsidiaries: Queensland Country Care Navigation Pty Ltd ABN 92 610 024 916 and, MTG QCB Trust Repo Series No. 1.

Pursuant to the requirements of the Modern Slavery Act 2018 (Cth), the contents of this Statement have been approved by the Board of Queensland Country Bank Limited ABN 77 087 651 027 and Queensland Country Health Fund Ltd ABN 18 085 048 237 as the governing body of each organisation.

A handwritten signature in black ink, appearing to read "C. Flynn".

Christine Flynn
Chair, Queensland Country Bank Limited
24 November 2022

A handwritten signature in black ink, appearing to read "Karen Read".

Karen Read
Chair, Queensland Country Health Fund Ltd
24 November 2022



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PART ONE: Our Business, Structure, and Supply Chains

1. This Joint Modern Slavery Statement is submitted by the Queensland Country Group pursuant to the *Modern Slavery Act 2018 (Cth)* in relation to the following two mandatory reporting entities:
 - Queensland Country Bank Limited (“**QCB**”) - ABN 77 087 651 027
 - Queensland Country Health Fund Ltd (“**QCHF**”) - ABN 18 085 048 237

(“referred to collectively, unless separately differentiated throughout this Statement, as **Queensland Country Group**”)
2. QCB also owns and/or controls the following entities that are not, individually, reporting entities under the Act:
 - **Queensland Country Care Navigation Pty Ltd** (ABN 92 610 024 916).
This entity was established to provide care coordination to policy holders. It is a subsidiary of Queensland Country Health Fund Ltd and subject to a management agreement with QCB.
 - **MTG QCB Trust Repo Series No. 1.**
This is a trust supporting the liquidity management of the Bank. The Bank is the residual income unit holder of the trust.
3. QCB and QCHF have consulted with these controlled entities throughout the process of preparing this Statement, and in relation to our overall modern slavery approach.

Our Business

Queensland Country Bank

4. QCB is a Member-owned bank based in Queensland. We have been operating since 1971. Our purpose is to help people in our communities to live better lives through better financial wellbeing.
5. QCB is an authorised deposit-taking institution and is regulated by the Australian Prudential Regulation Authority and by ASIC licences for the provision of financial services and credit. During the reporting period, QCB provided financial services, banking, and insurance products to approximately 115,000 members in Australia.
6. QCB provides the following kinds of products and services to our members:

Personal Banking

- Home Loans
- Fixed rate Home Loans
- Standard Variable rate Home Loans
- Home Equity Loans
- Line of Credit

- Personal Loans such as:
 - Car Loans
 - Secured and Unsecured Personal Loans
 - Renovation Loans
 - Transaction Accounts
 - Savings Accounts
 - Credit Cards
 - International Transfers
 - Foreign Exchange
 - International Payments

Business Banking

- Platinum, Basic and Online Saver Accounts
- Fixed Term Deposits
- Business Loans
- Commercial Overdrafts
- Business Visa Credit Cards
- Business Payment Solutions

Insurance

- Home and Contents Insurance
- Car Insurance
- Caravan Insurance
- Travel Insurance
- Landlord Insurance
- Boat Insurance

Queensland Country Health Fund

7. Queensland Country Health Fund Ltd is a registered “for profit” health insurer. QCHF shares management services with the Bank and, as detailed below in Part Two, has assessed its supply chain and investment portfolio in collaborations with QCB.
8. QCHF has over 68,000 persons covered throughout Australia. We are proud partners of the Members Health Fund Alliance and are a signatory to the Private Health Insurance Code of Conduct.
9. We have also continued to provide health insurance products to our customers in the Northern Territory through the brand ‘Territory Health Fund’, which is operated by Queensland Country Health Fund.
10. QCHF provides the following types of health insurance services:
 - Members Claim Management
 - Hospital and Extras Cover
 - Dental Services

- Community Nurse Care Navigation Services
 - Accommodation Units based near major Metropolitan Hospitals
11. All Queensland Country staff are employed by Queensland Country Bank and operate the Health Fund and Care Navigation businesses pursuant to a Management Agreement. Queensland Country Group has over 455 employees. The breakdown of the roles across our workforce is as follows:
- 52% of staff are engaged in customer facing roles;
 - 12% of staff are engaged in administrative roles; and
 - 36% of staff are engaged in professional roles.

Community Engagement

12. As a Member-owned organisation, a core part of our organisational ethos is a commitment to partnering and reinvesting profits within the communities of our Members. We continue to participate in a range of community initiatives including:
- Queensland Country Good for Good Community Grants – applying funds to eligible non-for-profit projects, with a focus on supporting projects that enable people to participate, experience, grow, learn, reach out, connect, make a difference and be safe.
 - Charity Partnership with Ronald McDonald House: particularly the North Australia and Southeast Queensland Chapters.
 - Annual Community Sponsorships, including to the following organisations:
 - North Queensland Toyota Cowboys
 - Mackay Cutters
 - Mount Isa Rotary Rodeo, and
 - Townsville Cricket Club
 - Community Partner Program - benefits such as waived monthly account service fees, fundraising assistance, and a merchandise welcome pack for not-for-profits we work with.

Our Supply Chains

13. Our direct supply chains included 1,078 direct suppliers during the reporting period. We continued engagement with various services in support of our day-to-day operations, including;
- Computer and Technical Services
 - Market Research
 - Cleaning Services
 - Services to Finance and Investment
 - Telecommunication Services
 - Advertising Services
 - Business Services



- Insurance Services
 - Printing and Stationery Services
 - Legal Services
 - Property and Facilities Management Services
 - Logistics, Postal and Transport Services
 - Education Services;
 - Health Providers;
 - Construction and Maintenance Services;
 - Catering and Food Suppliers.
14. Our supply chains have remained largely unchanged from prior reporting periods, both in terms of the types of suppliers we procure from and the geographies they are operating in. The direct suppliers for QCB, QCHF and our controlled entities remain primarily Australian-based companies (including Australian subsidiaries of global companies).
15. Whilst we have conducted risk assessment and due diligence on expanded areas of both our supply chains and operations during the reporting period, we do not consider there to have been a material change in our overall modern slavery risks compared to previous reporting periods.

PART TWO – Modern Slavery Risk Assessment

16. Queensland Country Group did not identify any actual or suspected instances of modern slavery in our operations or supply chains during the reporting period. We have once again assessed our overall modern slavery profile as low, based on our industry sector and geography of operation (as a financial and health insurance provider in Australia).

Supply Chain Risks

17. Queensland Country Group has continued its partnership with external consultants to assess the potential risks of modern slavery within our supply chains and, for the first time, our investment portfolios. This assessment uses proprietary technology to analyse the cumulative modern slavery risk through to the tenth tier of our supply chains, through assessing the complex interaction between factors including:
- Total supplier spend amount (i.e. the value of our direct supplier contracts);
 - Industry category, including industries that, in turn, feed into particular categories further down the supply chain;
 - Geographical area of operation; and
 - Depth of tiering within the supply chain(s)- e.g., 3rd tier supplier, 5th tier supplier, etc.
18. The Appendix contains a summary of the risk assessment methodology used for this risk assessment.
19. Using our procurement data for the reporting period, the proprietary risk assessment has again identified the areas of greatest potential modern slavery risk as being at tiers beyond our direct suppliers / procurement partners, and in the following industry categories:
- Computer and Technical Services in Australia;
 - Sports and Recreation Services in Australia; and
 - Australian Domestic telecommunication services.

Computer and Technical Services in Australia

20. The supplier category of ‘*computer and technical services*’ remains an ongoing source of potential modern slavery risk exposure. The modern slavery risks associated with this sector are located at deeper tiers of the supply chain, from end-stage assembly to individual component manufacturing in high risk Southeast Asian factories, all the way to the extraction of raw materials such as steel, cobalt, lithium, and aluminium from African and South American geographies that are marred by conflict and exploit child or forced labourers.
21. We are also aware of the emerging identification of supply chain linkages between computer and other electronic products (including those produced by major global brands) and alleged state-sanctioned forced labour of the Uyghur people and other Turkic minorities in China.

Australian Domestic telecommunication services

22. There is a significant overlap between the potential risks associated with the deeper tiers of the supply chains of our long-term procurement partner in this industry category, and the *Computer and technical services* sector (described above). There is an industry-wide dependence on complex electronic equipment manufactured using potentially high-risk componentry and raw material inputs including conflict minerals such as tin, tantalum, tungsten, gold, or cobalt.
23. In general terms, there are also potential risks associated with the longstanding practice of telecommunications providers operating foreign ‘back-end’ offices and call centres, including contracting to third-party providers in higher risk countries, such as the Philippines or India.
24. We are satisfied that our single, long-term supplier in this category (which itself is a reporting entity under the Act) is appropriately engaging in comprehensive due diligence measures to ensure that these generic risks are being appropriately mitigated.

Sports and Recreation Services in Australia

25. An additional supplier category identified in our more expansive risk assessment activities for this reporting period is *Sports and Recreation Services in Australia*. This category relates to our partnership with major sporting sponsorships, and ongoing associations with various local sporting clubs. Whilst our engagement with these sporting-related entities is not a new feature of our activities, this is the first reporting period that we have undertaken comprehensive modern slavery risk assessment in relation to these valued partnerships.
26. Our relationship with these entities varies from major ongoing sponsorships to smaller “one-off” recipients of our community partnership programs. We intend to continue focusing our due diligence efforts on engaging with the longer-term sponsorships, in recognition of the greater relative leverage, and a more established rapport of ongoing partnership to collaboratively improve procurement practices.
27. Whilst we have complete confidence in our direct partnerships (which provide significant community benefits), in line with our commitment to holistically addressing modern slavery, we recognise that these entities may have a range of potential direct and indirect areas of exposure to recognised modern slavery risks, including:
 - **Textile and apparel manufacturing services** - used to make sporting uniforms and promotional apparel for supporters. These are commonly connected with offshore manufacturing in high-risk countries such as India or Pakistan, which have an increased prevalence of forced and bonded labour. Further down the supply chain, key raw material inputs such as **cotton** may potentially be sourced from high-risk locations, such as the Xinjiang region of China.
 - The use of service providers at major sporting venues, such as **hospitality staff, security services, facilities management, and commercial cleaners**. Workers employed in these industries may be more susceptible to modern slavery risk

factors, such as itinerant migrant workers, willingness to engage in low paid/low barrier to entry roles, obtaining employment through recruitment agents, and/or employed in subcontracting arrangements.

- **Food and beverages** sold at sporting events may be manufactured, including abroad, by low skilled workers that are less protected from exploitation. At more remote supply chain tiers, some common raw ingredients, such as **tomatoes, sugarcane, coffee, or fish**, are recognised, on a global scale, as high risk for forced labour. The seasonality and potentially isolated geography of the farming sector also means that harvesting workers are more vulnerable to exploitation.
- Key material inputs that are prevalent in the manufacture of sporting equipment, such as **rubber**, are often sourced from high-risk countries. Similarly, **leather** has been linked to forced labour practices from cattle ranching in South America to leather tanneries operating in high-risk countries including India, Bangladesh, and Vietnam.

Investment Risks

28. Queensland Country Group expanded the assessment of modern slavery risks to include a comprehensive assessment of our investment portfolio, including both QCB and QCHF.
29. The risk assessment identified the following investment category focus areas:
 - Australian banking and non-banking financial products; and
 - Services to finance and investment in Australia.
30. The relative risk associated with these categories, as with our portfolio as a whole, is relatively low. This is a function of investments being held in Australian-based banking institutions, regional banks and credit unions, specialised finance products, Australian treasury bonds and Australian based branches of foreign banking institutions.
31. Our institutional approach to investment prioritises more conservative growth strategies. This means that we do not invest in typically higher-risk products (including from a modern slavery perspective), such as emerging markets portfolios.
32. The potential risk areas associated with these investment categories are primarily attributable to the unavoidable prevalence of computer and hardware products, which are instrumental the day-to-day operations of organisations within these sectors.

Operational Risks

33. Our external consultants have also worked with us to review our operational risk exposure.
34. We have assessed the modern slavery risks in our direct operations as being very low. Our employee workforce is engaged in technical and professional roles, and we encourage strong engagement with enterprise bargaining representatives and union representatives.

35. However, we recognise there is always potential risk of direct and indirect exposure to modern slavery, even for operations such as ours. We have specifically assessed some of these possible areas of operational risk, detailed below.
36. Like virtually all organisations in Australia, Queensland Country Group is reliant upon office and other commercial premises for our day-to-day operations. These offices require services such as cleaning, catering and facilitates management. Similarly, our customer service branches engage with companies that provide security and cleaning services. We recognise that these industries, although operating in an Australian context, present potential linkage to workforces that may be more vulnerable to exploitation, including in the form of forced or bonded labour. These industries may be more reliant on foreign workers with their employment linked to visa status, making them more unlikely to report circumstances of exploitation.
37. We continue to track emerging international evidence relating to elevated modern slavery risks associated with renewable energy infrastructure, particular in relation to solar panel supply chains tainted by Uyghur forced labour. As we have identified this as a future area of potential risk, should such procurement occur the future, we will undertake focused due diligence prior to any significant purchasing decisions being made.

Financial Payment Services & Lending facilities

38. As a Group that provides retail banking and financial transactional services, we understand that such products can, in certain circumstances, provide indications of modern slavery. In particular, we acknowledge the use of digital overseas payment transfer services to facilitate online child sexual exploitation. We are continuing to ensure that the major third-party provider that we engage with to facilitate international transfers from customer accounts maintains and updates vigorous screening frameworks to detect and prevent the occurrence of such criminal activity.
39. Our Legal and Compliance Team continues to ensure strict adherence to the Australian Anti-Money Laundering / Counter Terrorism Financing regulatory obligations. As part of our compliance, we have robust 'Know Your Customer' systems in operation to properly screen customers against key indicators, including those that are well-recognised identifiers of potential modern slavery practices.

PART THREE – Addressing Modern Slavery Risk

41. In our Second Statement, we reported on our efforts to create a comprehensive measuring effectiveness framework, which included a roadmap of future modern slavery focused actions to build our capabilities year-on-year. During the reporting period, we finalised and operationalised this response framework which is centred around the following five action pillars:

- Commitment & Governance
- Traceability & Risk Assessment
- Purchasing Practices
- Worker Voice
- Monitoring of Progress and Effectiveness

Commitment & Governance

42. The first pillar of our roadmap focuses on creating formal frameworks to support the Group's anti-slavery commitments. During the reporting period, we have focused on the following action within this pillar:

- Development of Human Rights & Grievance Procedures;
- Creating compliance with our supplier code of conduct;
- Creating a Modern Slavery Working Group; and
- Facilitating group-wide training.

Human Rights Policy & Grievance Mechanisms

43. Queensland Country Group has worked with our external consultants to develop a Human Rights Policy, which details our commitment to upholding human rights in our operations and business relationships and protecting our employees, contract workers and workers within our supply chains. This commitment to human rights is inclusive of our specific commitment to addressing modern slavery.

44. To enact these commitments, the policy sets out that the Queensland Country Group will:

- Avoid causing or contributing to adverse human rights impacts through our business activities and will commit to addressing those human rights impacts when they occur;
- We will seek to prevent or mitigate adverse human rights impacts as they are linked to our operations, products, services, or business relationships;
- Undertake due diligence to identify, prevent and mitigate risks, using a regular risk assessment process and reporting under the Act;
- Engage with our internal and external stakeholders to assess, address, and remediate actual and potential human rights impacts;
- Raise awareness about issues in our workplace and provide training across the organisation to support this commitment.

45. This policy is published on our staff intranet.

46. As part of the Human Rights Policy development process, we reviewed our Whistleblower Policy to ensure its contextual appropriateness for reporting any instances of suspected modern slavery, or other serious human rights breaches.

Compliance with our Supplier Code of Conduct

47. Our Supplier Code of Conduct sets out our expectations regarding treatment of workers in our suppliers' operations and supply chains, including:
- Ensuring all work is free, voluntary and with no unreasonable restrictions on workers freedom of movement;
 - Not withholding identity documents;
 - Prohibition on child labour;
 - Using reasonable efforts to ensure that any third-party recruitment agencies abide by our Code and agreeing to repay any recruitment fees paid by workers;
 - Exercising due diligence in relation to assessing their operations and supply chains for modern slavery risks;
 - Facilitating processes that allow workers to make complaints about their working conditions; and
 - Allowing Queensland Country to undertake evaluations of the supplier's facilities and operations to monitor compliance.
48. We have developed uniform processes to improve supplier awareness of, and compliance with, our Code. This is being achieved through two main approaches:
- We have updated our "purchasing flow" process on our staff intranet, which sets out the steps an employee must take before making any purchase for the Group. Any employee undertaking procurement must refer the prospective supplier to the Code of Conduct prior to a purchase being authorised. The Supplier Code of Conduct is also linked to the Group's broader Procurement Policy, which ensures that the Code is part of our formal policy framework, including our review mechanism.
 - Our Facilities Manager has revised our contractor induction pack, so that all new contractors engaged by the facilities department must execute a written acknowledgement of our Supplier Code of Conduct.

Internal Modern Slavery Working Group

49. During the reporting period, Queensland Country Group established a Modern Slavery Working Group, which is responsible for monitoring our overall effectiveness in addressing modern slavery and steering our action over consecutive reporting periods.
50. Our Working Group is comprised of the following members from key departments across the group:

- Head of Governance & Company Secretary;
 - Head of Human Resources;
 - Company Solicitor;
 - Governance Officer;
 - Facilities Manager;
 - Retail Operations Manager; and
 - Head of Employee Engagement
51. We have also included the Health Fund Sales Manager as a representative from the Queensland Country Health Division of the Group, to ensure that our anti-slavery strategy has holistic input across all entities.
52. The Working Group has met regularly over the reporting period. Focus areas have included endorsing our Measuring Effectiveness Framework, including our roadmap of action for FY23, detailed further below at Part Five.
53. The Working Group has also reviewed our progress against the planned measures detailed in our last statement (described further below in **Part Four**). The Working Group is ensuring it keeps up to date with relevant issues and trends in modern slavery, such as the implications of the recently released report by the Office of the UN High Commissioner for Human Rights on its *Assessment of Human Rights Concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China*.
54. Queensland Country Group has also created a Sustainability Management Committee, which reports to the Board Remuneration & Governance Committee. Modern slavery is a standing item on the agenda for this Committee, which enables our Company Secretary to provide progress updates on the work of the Modern Slavery Working Group.
55. These measures are designed to ensure that our response to modern slavery issues remains on the agenda at the executive level.

Training & Education

56. Internal training and capacity building remain important to our overall modern slavery response. A mandatory group-wide training module was released during the reporting period. The program focused upon establishing and maintaining foundational organisational awareness of:
- What modern slavery is;
 - Our obligations as a reporting entity under the Act;
 - Our key initiatives to address modern slavery; and
 - The importance of engaging with suppliers to identify and respond to modern slavery issues.
57. The training included additional modules for relevant managers that set out our approach to embedding modern slavery considerations into procurement decisions and provided accompanying policies to staff for review.

58. At the close of the reporting period, a total of 394 staff had completed the module, out of an eligible 398 staff. We will continue to use training in future reporting periods to build staff capabilities, with a focus on providing specialist training to relevant executive staff.

Industry Collaboration

59. In addition to our own internal Modern Slavery Working Group, the Queensland Country Group has used the reporting period to strengthen our engagement with external stakeholders, through our membership and participation in industry initiatives focused on addressing modern slavery.

Queensland Country Group was admitted as a member of the UN Global Compact’s “Network Australia” in the reporting period. which is the principal sustainability initiative in Australia that is made up of a variety of private sector stakeholders to advance sustainable business practices. We have also joined the Network’s Modern Slavery Community of Practice and our Company Secretary representative has attended our first Community meeting.¹

60. In scoping the issue of participation in a more industry specific collaborative group, we noted an absence of modern slavery focused groups for member owned organisations such as ours. In response, QCB has worked with the Business Council of Cooperatives & Mutuals, the peak body for member-owned organisations, to establish a Modern Slavery Working Group.
61. Our Company Secretary is the chair of this Group, which first met after the close of the reporting period, but prior to the lodgement of this Statement. This Working Group is focused on facilitating collective learnings about industry opportunities and challenges in meaningfully addressing modern slavery, including the monitoring of regulatory and legislative developments and best practice compliance.
62. Queensland Country Health Fund has also joined the Private Health Insurance Modern Slavery Community of Interest. The Community has met quarterly across the reporting period and has focused on providing a collaborative environment to discuss best practice approaches in the industry. We are represented by our Health Fund Sales Manager, who is also a member of our internal Modern Slavery Working Group. This cross-representation means our internal Working Group is able to directly benefit from the learnings and experience of the broader private health industry in responding to modern slavery issues.

Traceability & Risk Assessment

63. The second pillar of our framework focuses on improving our modern slavery risk assessment. Simply put, the better our visibility over areas of risk exposure, the more effective our long-term response will be.
64. We have continued to engage with our external consultants to undertake a multi-tiered risk assessment on our supply chains. To broaden the scope of this assessment, during the third

¹ These actions occurred after 30 June 2022, but prior to lodgement of this Statement.

reporting period an assessment was undertaken on our investment portfolio. We also almost doubled the number of suppliers subject to the proprietary risk assessment.

65. Our Modern Slavery Working Group uses the risk assessment results to directly inform follow-up due diligence action, such as which suppliers to focus on for engagement, including issuing self-assessment questionnaires.

Purchasing Practices

66. Queensland Country Group recognises the positive role that our procurement decisions can play in actively addressing modern slavery risks. To improve our engagement with suppliers, we have developed clauses addressing modern slavery for supplier contracts drafted by us. We have also examined the nature and extent of actions to address modern slavery risks being engaged in by select suppliers.

Modern Slavery issues being addressed through supplier contract clauses

67. During the reporting period, we implemented a new mandatory provision for new supplier contracts drafted by Queensland Country that specifically addresses modern slavery issues. Going forward, these provisions will be incorporated into new supplier contracts we prepare and enter into.

Specific Supplier Monitoring

68. Queensland Country Group has issued self-assessment questionnaires to screen the modern slavery risks and associated mitigation practices of selected suppliers.
69. We focused on issuing questionnaires to our highest spend suppliers, particularly those that operate within potentially elevated risk areas, such as computer related suppliers or our long-term sporting sponsorship partners.
70. The questionnaires are designed to identify red flags within the workplace practices of the supplier, obtain further details of the actions taken by these suppliers to address modern slavery risk and request company policies to substantiate responses.
71. We had an excellent response rate from our suppliers, and have gained the following insights from this process:
 - There is a strong correlation between suppliers that had robust measures and suppliers that are reporting entities.
 - A majority of suppliers provide adequate support to their personnel in relation to workplace conditions, such as explaining the terms of employment contracts to staff and providing training on employee rights.

- A quarter of respondents reported to have migrant workers within their operations, but these suppliers reported to have sufficient workplace practices to address any potentially associated risks.
- Only half of the respondents reported the existence of processes to engage with their supply chain, such as responsible sourcing policies or procurement screening programs.
- Most respondents had workplace training programs and appropriate grievance mechanisms in place to receive reports of modern slavery.
- No respondents had engaged directly with their workers or third parties in the creation of their worker engagement or grievance processes.

72. These insights have provided us with clear areas to focus on as part of ongoing, mutually productive collaboration.

73. Queensland Country Group plans to continue engagement with suppliers on modern slavery issues, including through the self-assessment questionnaire process. Our focus is on achieving meaningful engagement and impact, rather than simply increasing quantitative output in terms of the total number of questionnaires completed.

74. As part of this approach, we plan to provide modern slavery training materials to suppliers when issuing further questionnaires. It is hoped that this future initiative will not only improve the quality of due diligence insights gained by us, but also assist our suppliers (particularly smaller, non-reporting entities) to engage more fully with the issues, and assume a greater sense of ownership over their own modern slavery response.

Worker Voice

75. As part of Queensland Country Group's recognition that modern slavery risks can affect our operations, our response framework focuses on facilitating the 'worker voice' of our personnel. This is achieved through working to create workplace environments that promotes candid worker-management dialogues.

76. Queensland Country has a robust and collaborative process to facilitate worker engagement with trade unions and enterprise bargaining representatives, above the minimum standards required by the Fair Work Commission. We have multiple enterprise bargaining representatives across all entities within the group (including separate representatives for Queensland Country Health Fund).

77. We fund course attendance for all Enterprise Bargaining Representatives, Management Representatives and Union Delegates, that are facilitated by an external provider, to build skills in translating the voice of workers in good faith bargaining. We also finance the provision of external advice to these representatives, if required.

78. We invite the relevant union membership to all relevant meetings and negotiations. We also survey our staff prior to any major enterprise bargaining, using an external independent



organisation, to enable workers to disclose their priorities and pain points. We use this process to ensure that the concerns of our workers are heard at the bargaining table.

79. Queensland Country Group will continue to facilitate this collaboration with our workers and ensure that all staff have freedom of membership to relevant trade unions.

PART FOUR – Measuring Our Effectiveness

80. The final pillar of our modern slavery response framework is *Monitoring of Progress and Effectiveness*, which is focused on regular and candid self-assessment of our practices.
81. Our Modern Slavery Working Group has responsibility for regularly reviewing our progress against the performance indicators in our framework. The Working Group provides regular status reports to the Sustainability Management Committee, which reports to the Board Remuneration and Governance Committee.
82. For this reporting period, our progress has been tracked against commitments made in our FY21 Statement and our measuring effectiveness framework and roadmap as follows:

Framework Pillar	FY22 Yardstick of Progress	Status update
Commitment & Governance	Development of Grievance and Reporting mechanisms to specifically address Modern Slavery.	Completed. Grievance mechanism embedded into Human Rights Policy.
	Develop processes to ensure compliance with Supplier Code of Conduct.	Completed. Updates to purchase policy flow, procurement policy and contractor induction pack.
	Establishing a modern slavery working group responsible for monitoring progress and generally steering Queensland Country Group’s modern slavery action moving forward.	Completed (and ongoing). Working Group established with key members from range of departments and entities.
	Provision of training to staff, focused on identifying and addressing modern slavery, with tailored training for key departments.	Completed. Training undertaken by 98% of staff, including additional material completed by relevant managers.
	Queensland Country Group to become member of industry specific working group.	Completed (and ongoing). Group joined two existing working groups and established a mutuals & co-ops working group.

Traceability & Risk Assessment	Queensland Country Group has a process to assess modern slavery risks, and it publicly discloses modern slavery risks identified in different tiers of its supply chains.	Completed (and ongoing). Proprietary risk assessment undertaken on additional suppliers and investment portfolio of the Group.
Purchasing Practices	Development of modern slavery provisions for incorporation into supplier contracts prepared by Queensland Country.	Completed. Provisions created, ready for inclusion in all supplier contracts drafted by Queensland Country.
	Queensland Country Group will provide training for select suppliers.	In progress (focus area for next reporting period). Queensland Country Group will look to issue training materials alongside SAQs to select suppliers in next reporting period.
	Queensland Country Group has engaged with selected suppliers to review their modern slavery action. Some of these suppliers are not mandatory reporting entities.	Completed (and ongoing). Queensland Country Group has focused on engagement with high spend suppliers in issuing SAQs.
Worker Voice	Queensland Country Group facilitates all trade union access to worksites.	Completed (and ongoing). Queensland Country Group has continued to foster union membership and engagement with workers.
Monitoring of Progress & Effectiveness	Queensland Country Group includes the specific actions that it will take in the upcoming financial year to address modern slavery and human trafficking issues and progress made on actions committed to in previous year's statement.	Completed (and ongoing). We have detailed below our roadmap for FY23.

PART FIVE - Consultation with Controlled entities & Other relevant information

83. All necessary consultation and engagement across all controlled entities within the Queensland Country Group has occurred in relation to our overall modern slavery response over the reporting period, as set out in this Statement.

Other Relevant Information

84. Our Modern Slavery Working Group has developed and approved our action plan for the FY23 reporting period.

85. The below summary table builds upon the previously established key performance indicators, to ensure continuous improvement in our modern slavery response. We plan to report on our progress against these indicators in our next statement.

Framework Pillar	FY23 Yardstick of Progress
Commitment & Governance	Improve Contract Checklist for contracts over agreed value.
	Review selected suppliers to ensure compliance with Supplier Code of Conduct.
	Continue annual staff training.
	Specialised modern slavery training for Board Members, working group members and senior staff.
	Continued membership of all industry bodies and collaborative groups.
	Maximise the number of suppliers assessed for modern slavery risk.
Traceability & Risk Assessment	Continue risk assessment of investment portfolio.
	Implement a standard modern slavery risk assessment framework to review selected new suppliers.
Purchasing Practices	Assess (relatively) higher-risk suppliers for modern slavery as part of the procurement process.

	<p>New suppliers have modern slavery provisions incorporated in their contract, for all contracts drafted by Queensland Country Group.</p> <p>Engage with targeted group of suppliers to review their modern slavery action. Some of these suppliers selected will not be mandatory reporting entities.</p> <p>Provision of training to suppliers during the process of issuing self-assessment questionnaires.</p>
Recruitment	<p>Continue to facilitate trade union access to worksites.</p> <p>Update of management policy to reflect best practice recruitment principles.</p>
Worker Voice	<p>Continue to facilitate trade union access to worksites and worker membership of trade unions.</p>
Remedy	<p>Queensland Country Group to undertake processes to provide remedial action where any instances of modern slavery identified.</p>
Monitoring of Progress & Effectiveness	<p>Working Group to track development of all commitments in FY22 Statement and report publicly on progress.</p>

APPENDIX – Initial Risk Assessment Methodology Summary

1. As discussed in Part Two, we have continued engagement with external consultants to undertake ongoing comprehensive risk assessment in relation to new supplier categories that were not previous subject to assessment.
2. Incorporating company spend data throughout global markets, we have utilised external consultants with proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of Queensland Country Group’s top suppliers by spend.
3. This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors. This MRIO table is assembled using the following sources:
 - a. The United Nations’ (UN) System of National Accounts;
 - b. UN COMTRADE databases;
 - c. Eurostat databases;
 - d. The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO); and
 - e. Numerous National Agencies including the Australian Bureau of Statistics.
4. The MRIO is then examined against the following international standards:
 - a. The UN Guiding Principles on Business and Human Rights;
 - b. The Global Slavery Index;
 - c. International Labour Organisation (ILO) Global Estimates of Modern Slavery; and
 - d. The United States’ Reports on International Child Labour and Forced Labour.
5. A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier of Queensland Country Group.
6. This analysis was performed for the purposes of risk identification under Section 16(1)(c) of the Act. No information confirms the actual existence of non-existence of slavery in Queensland Country Group’s supply chains, operations, or investments. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region, or product level.

7. The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:
 - a. The individual suppliers and industries with the most elevated risk of modern slavery;
 - b. Supply chain and investment plots to provide a visual representation of the supply chains for Queensland Country Group's top 3 first tier industries;
 - c. Plotting the relative slavery risk in the supply chain by tier, up to tier 10;
 - d. Geographical depiction of the cumulative risk of modern slavery across the supply chain around the world;
 - e. An overview of the classification of the first tier of our supply chain by country and industry, including relative modern slavery risk; and
 - f. Suppliers in our supply chains and operations that posed any calculated risks in relation to modern slavery were identified.