

The logo for Greater Bank, featuring the words "Greater Bank" in a white, sans-serif font. To the right of the text is a stylized orange arrow pointing to the right, which is part of the bank's branding.

**Greater Bank**

***Modern Slavery Statement 2020***

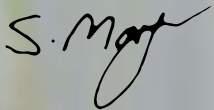
This statement is for Greater Bank limited (ABN: 88 087 651 956)

## Message from our CEO

As a customer owned bank we are invested in and focused on our customers and the communities we operate in. It is important to us that we ensure our operations are run in an ethical way and that we contribute positively to our communities.

We recognise that modern slavery is a growing problem that impacts and exists in all countries and that no industry is immune from this issue. We are committed to ensuring that our operations and supply chains do not contribute to or accept any forms of slavery.

This is our first Modern Slavery Statement and has been published in accordance with the *Modern Slavery Act 2018*. It outlines the steps we are taking in order to identify, avoid, manage and mitigate the risks of modern slavery that may exist in our operations and supply chains.



Signed, **Scott Morgan**, Chief Executive Officer

This statement was approved by the Board of Greater Bank Limited.



Signed, **Wayne Russell**, Chairman

## Acknowledgement of Country

We respect and honour Aboriginal and Torres Strait Islander Elders past, present and future. We acknowledge the stories, traditions and living cultures of Aboriginal and Torres Strait Islander peoples on this land and commit to building a brighter future together.

## Modern Slavery Risks Faced by Greater Bank

Greater Bank is a customer owned bank, operating predominantly in New South Wales. Our Head Office operations are spread over two locations in Newcastle and Lake Macquarie. We provide banking services to customers throughout New South Wales and South East Queensland.

After the Commonwealth modern slavery framework commenced, we performed preliminary mapping of our supply chains and then conducted an initial risk assessment of the modern slavery risks in our operations and supply chains.

As most Greater Bank team members are employees, there is a lower risk of modern slavery risks within our direct team. Our operational risk assessment has therefore focused on aspects of our operations that use contracted or third-party providers as these areas carry a greater risk.

We work with a number of suppliers, who are located in Australia and other areas such as New Zealand and throughout Asia.

### Engagement with Suppliers

Through our preliminary mapping activities and initial supply chain risk assessments we identified and then approached our top twenty suppliers (based on annual spend). We engaged with these suppliers and distributed a questionnaire for them to complete in order to assist us in better understanding any modern slavery risk areas or potential concerns within their operations and supply chains.

#### Modern Slavery Questionnaire

The questionnaire requested details such as:

- The business structure and registration;
- Details of the direct and indirect sub-contractors involved in supplying goods and services to Greater Bank (including the countries they primarily operate in and where raw materials and components are sourced from);

- Whether they have any written policies and procedures relating to modern slavery risks and if so, how compliance with these is monitored; and
- Whether any reports or concerns regarding modern slavery had been raised within their business, supply chains, or contractor/sub-contractor arrangements, and whether there were whistleblowing mechanisms in place within their organisation.

As part of the questionnaire process, the suppliers were also required to confirm their agreement with our modern slavery governance requirements.

#### Results

We received a high response rate from the suppliers we approached. Based on these responses we then completed further risk assessments regarding these suppliers.

In carrying out these assessments we considered influential factors that can promote modern slavery, including geographical location and interaction with vulnerable demographics, as well as industry and the type of product or service being supplied. Based on these considerations we determined that our highest risk contracts were those related to the procurement of textiles/clothing and cleaning services, these then formed our focus for this financial year.

### 2020 Highlights

- A Modern Slavery Questionnaire provided to our key suppliers to understand their operations and risks;
- Risk assessments conducted on our key suppliers (by contract value);
- Anti-slavery provisions included in key contracts;
- Modern slavery risks incorporated into Procurement risk assessment framework; and
- Training sourced for key personnel

## Actions taken

### Introduction of modern slavery provisions to key contracts

During the 2019-2020 financial year, the two key contracts in these focus areas were renewed and we ensured that modern slavery provisions were incorporated into the new contracts. These require our suppliers (and their subcontractors) to comply with relevant anti-slavery laws, including the requirements of the Commonwealth Criminal Code.

It is also now a contractual requirement that our suppliers provide us with any requested information regarding their practices and procedures for complying with anti-slavery laws. This provides us with assurance that this compliance is occurring as well as remediation options which can be relied upon in the event of a breach.

### Enhancements to the Procurement Framework

We have also been making enhancements to our overall procurement framework. This has included updating our procurement processes to include a requirement for specific anti-slavery due diligence to be undertaken, which involves assessing prospective supplier's performance in terms of identification, prevention and mitigation of any modern slavery risks.

### Assessing Effectiveness

Due to the complex nature of the issue of modern slavery, and the fact that it can often be disguised, it can be difficult to assess whether preventative measures are effective. Our risk assessment process allows us to continue to identify any higher risk areas, and determine which areas require the most focus. Our engagement with our suppliers also helps us to ensure that our partners are working alongside us to minimise slavery risks.

By completing this additional due diligence over suppliers, we are able to ensure that all goods and services we procure are not the product of modern slavery. This allows us to confirm that our suppliers' values are consistent with our own before we commit to working with them. By including anti-slavery provisions within contracts, we are also ensuring there will be ongoing monitoring, transparency and reporting, which allows us to respond to any issues if or when they arise.

The continuing development of our Modern Slavery Framework will also ensure that we can adapt our approach to new risks as they arise.

## Future Improvements

We recognise that combatting modern slavery requires ongoing efforts and we are committed to continuing our efforts in this area. Some of the future work we have planned includes:

### Further risk assessments

Our initial supply chain risk assessment process has allowed us to begin the process of ensuring that all of our operations and contracting arrangements are ethical and reflective of our organisational values.

Further work is now underway to undertake a preliminary assessment on all our suppliers, to allow us to identify other at risk areas within our supply chains and manage these risks accordingly.

### Training

Modern slavery training has been sourced and will be delivered to key personnel, including those working in procurement and owners of high risk contracts.

### Improved Governance

We are further developing and documenting a modern slavery framework that will apply across the whole organisation. The continuing development and improvement of this framework will enable us to adapt our approach to new risks as they arise.

We are also continuing to incorporate modern slavery protections into new and renewed contracts.

**GreaterBank** 

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