

Modern Slavery Statement

1 July 2023 to 30 June 2024

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CONTENTS

Sections

| | | |
|----------|---|-----------|
| 1 | Introduction | 3 |
| 2 | Our structure | 4 |
| 3 | Our operations | 4 |
| 4 | Our supply chains | 6 |
| 5 | Identifying the risk of Modern Slavery practices | 8 |
| 6 | Actions taken and assessing the effectiveness of those actions | 11 |
| 7 | Case study | 19 |
| 8 | Looking forward | 20 |

Annexure

| | | |
|----------|---------------------------|-----------|
| 9 | Mandatory Criteria | 21 |
|----------|---------------------------|-----------|

1 Introduction

This Modern Slavery Statement (“Statement”) is submitted by The Smith Family pursuant to the Modern Slavery Act 2018 (Cth) (“Act”). This Statement covers the reporting period from 1 July 2023 to 30 June 2024 (“Reporting Period”).

The purpose of this Statement is to report on the steps that The Smith Family has taken in the Reporting Period to assess and address the risk of Modern Slavery practices in our operations and supply chains.

The Smith Family is committed to continuously improving our practices and processes to assess and address Modern Slavery risk in our operations and supply chains. A refreshed work program in the last 12 months allocated key responsibilities to identified team members through the establishment of a working group, and led to greater engagement with and contribution from the functional teams that carry the highest potential for exposure to Modern Slavery risk.

Our Statement details progress on our Modern Slavery work program for the Reporting Period. The work program was a combination of continuing and improving the work program established in previous years, implementing new initiatives to strengthen the work program, and completing the actions flagged for attention in our FY23 Modern Slavery Statement.

A summary of all actions taken in the Reporting Period is outlined in Section 6. Highlights of the key areas of progress in the Reporting Period are included in the following table:

| Action taken | Progress made |
|---|---|
| Established a Modern Slavery Working Group (“MSWG”) | Supported team awareness and engagement; and improved guidance, support and coordination in our Modern Slavery work program. |
| Updated our approach to include supply chain mapping to identify and conduct due diligence on the top 10 higher-risk suppliers from supply chains not previously subject to review. | Expanded our assessment and addressing of Modern Slavery risk to include a broader set of supply chains, not only those supply chains previously identified as carrying a higher exposure to Modern Slavery risk. |
| Implemented an automated Contract Management System. | Supported improved governance and oversight of the onboarding and execution of supply and funding contracts. |
| Strengthened due diligence for suppliers already subject to review, particularly in sectors relating to advertising and marketing, landlord suppliers and cleaning services. | Captured additional information about those suppliers, in turn supporting more complete and transparent risk assessments; and providing a better baseline for future monitoring and assessments. |

The updated work program for the Reporting Period represents a solid improvement in our approach to Modern Slavery risk and provides an important foundation for continued improvement in our work program in future reporting periods.

2 Our structure

The Smith Family is an independent charity, registered with the Australian Charities and Not-for-Profits Commission (“ACNC”), that works with children and young people to overcome educational inequality caused by poverty – so they can thrive now and into their futures.

The Smith Family is an Australian public company limited by guarantee, incorporated under the Corporations Act 2001 (Cth) (ABN: 28 000 030 179) with its registered office at Level 17, 2 Market Street, Sydney NSW 2000. It does not own or control any other entities.

The Smith Family is primarily funded by donations from its generous supporters, supplemented by Government funding and income from Investments (see [*Figure 1: Our funding sources in Section 3. Our operations*](#)).

The Board of Directors (“Board”) is the principal governing body of The Smith Family. It has responsibility for the overall governance of The Smith Family and is the ultimate decision-making authority. The Board delegates day-to-day operational management, governance and decision-making to the Executive team, whilst maintaining its oversight role.

The Finance, Audit and Risk Committee is the Board Committee that has oversight of The Smith Family’s risk and compliance obligations, including the Modern Slavery work program and reporting.

The Chief Financial Officer (CFO) has operational responsibility for managing Modern Slavery risk and compliance obligations, including the functioning of the Modern Slavery Working Group, delivery of the annual Modern Slavery Action Plan and reporting to the Finance, Audit and Risk Committee on how The Smith Family is meeting its obligations.

3 Our operations

The Smith Family’s operations are wholly located and delivered in Australia. Our core services and programs have not changed in the Reporting Period.

The Smith Family partners with children, young people, families, schools and communities to provide long-term educational support to young Australians experiencing disadvantage. We deliver education-related scholarships, programs and supports nationally to help students overcome educational inequality caused by poverty. At every stage of their education, The Smith Family provides support to help improve student educational outcomes, in turn helping students to unlock better futures for themselves.

Research and evidence-based practice underpins our work. Measuring our outcomes and using data to improve our effectiveness helps us to drive continuous improvement in our support and programs.

As explained in previous Modern Slavery statements, The Smith Family takes a broad view of what constitutes its “operations” for the purposes of Modern Slavery reporting. The Smith Family considers that its “operations” comprises both:

- Service delivery of our programs, and the associated support functions and research that underpins this work; and
- Funding sources that facilitate the delivery of our programs.

Further details of both aspects of our operations are set out below.

Service Delivery

As at 30 June 2024, The Smith Family had 982 team members and 4,931 volunteers nationally, and was supporting 178,340 children and young people experiencing disadvantage across Australia.

Predominantly, our team members (employees and volunteers) deliver our programs directly, and provide associated support functions which include Finance, Fundraising, HR, ICT, Marketing and Communications, Research and other administrative support. From time to time we also partner with other organisations, such as other charities and community-based organisations, to deliver programs that will benefit the educational outcomes of the students we support.

As set out at [Section 5](#), during the Reporting Period we identified that the level of Modern Slavery risk associated with our workforce is low.

The products and services that contribute to the delivery of programs and the associated support functions are outlined at [4. Our supply chain](#).

Funding sources

The Smith Family's operations are underpinned and facilitated by the generous support we receive from individuals who sponsor children and donate to our work, and partners from Australia's corporate sector, trusts and foundations, universities, and governments.

The Smith Family conducts significant fundraising activities to generate the funds that allow us to deliver our work in support of young people experiencing disadvantage. Funding source categories and examples of inclusions in each category are described in *Figure 1*.

Figure 1: Our funding sources:

| Funding Sources | Category | Examples |
|-----------------|-----------------------|---|
| | Individual supporters | Funds donated by individual sponsors, donors and bequestors |

| | | |
|------------------------|--------------|---|
| Funding Sources | Philanthropy | Funds from major donors, trusts and foundations, corporate partners, events and community fundraising |
| | VIEW clubs | Our network of VIEW clubs (268) and members (13,264) who support and promote our work nationally |
| | Government | Commonwealth and State/Territory Government funding to deliver our programs |

Over 90% of our funding sources are from individual donors and supporters, Government funding, or philanthropy sources that we have assessed as having very low Modern Slavery risk.

However, as identified in previous Modern Slavery Statements and as discussed in [Section 5. Identifying the risk of Modern Slavery practices](#), the funding sources that have been identified as having the higher potential to introduce the risk of Modern Slavery into our operations are:

- Corporate partners, relating to the supply chains that underpin those corporations; and
- Investments in local and foreign businesses managed through our investment portfolio.

4 Our supply chains

Our supply chains include the products and services that contribute to our operations, including to support the national delivery of our education programs and the support functions for that work including the advertising and marketing activities that underpin our fundraising.

The Smith Family is an Australian-based services organisation with the vast majority of its goods and services purchased from suppliers located in Australia. We have assessed this as an indicator of a comparatively lower risk of Modern Slavery in our supply chains considering Australian employment and industrial laws.

During the Reporting Period we engaged 1,907 suppliers, comprising 210 (11%) suppliers with an annual expenditure above \$25,000; and 1,697 (89%) suppliers with an annual expenditure of less than \$25,000.

We are continuing to enhance our procurement processes, particularly for suppliers where annual expenditure exceeds \$25,000. However, we do not have a centralised procurement function. Our procurement policy applies to team members who are responsible for the procurement of goods and services. Our suppliers are required to comply with our Supplier Code of Conduct, and this Code is shared with new suppliers at the time of first engagement.

Supply chain categories and examples of each category are outlined in Figure 2.

Figure 2: Our supply chains:

| Products and services | Category | Examples |
|------------------------------|--|--|
| | Program supplies | Gift card purchases and program resources. |
| | Advertising and marketing | Advertising, fundraising and marketing activities, media and digital communications, printing and collateral. |
| | Facilities, utilities and communications | Landlord suppliers, cleaning services, repairs and maintenance, internet/data costs, phones, electricity, storage. |
| | ICT systems and services | Cloud services and hosting, software and licences, hardware including maintenance and support services. |
| | Professional and consulting services | Audit and accounting support, payroll services, legal services and specialist consultancies. |
| | Travel | Travel and accommodation supplies to support the delivery of programs in locations throughout urban, regional and rural Australia. |
| | Other supplies | Postage, venue hire, research activities. |

As identified in previous Modern Slavery Statements and as discussed in [Section 5. Identifying the risk of Modern Slavery practices](#), the supply chains that we have identified as having a higher potential to introduce the risk of Modern Slavery are:

- Advertising and marketing suppliers;
- ICT systems and services suppliers; and
- Landlord suppliers and cleaning services contractors.

5 Identifying the risks of Modern Slavery practices

During the Reporting Period, our CFO who has operational responsibility for Modern Slavery risk led a Finance team review to confirm whether our established Modern Slavery work program was well targeted, and in turn to inform and improve our work program for the Reporting Period.

The review considered key Modern Slavery risks in our operations and supply chains, namely the geographic, industry sector and product and services risks in categories outlined in Figures 1 and 2 above. The review findings were:

- Our established work program was well targeted and should continue to form the core of our Modern Slavery work program for the Reporting Period.
- We had an opportunity to expand our work program by conducting due diligence on the top 10 higher-risk suppliers identified from supply chain categories not previously reviewed.
- Our Modern Slavery work program would benefit from the establishment of a Modern Slavery Working Group to guide, support and coordinate our efforts.

Our Modern Slavery work program, including the above actions, is discussed in detail at [Section 6](#).

In line with previous reporting periods, the Modern Slavery work program including the risk assessments for the Reporting Period continued to be conducted by the functional teams responsible for the identified areas of potential Modern Slavery risk (primarily our Philanthropy, Fundraising, Property and ICT teams). These risk assessments were overseen by a newly established Modern Slavery Working Group.

Operations – risk assessment

During the Reporting Period, functional team risk assessments did not identify any new or emerging areas of Modern Slavery risk in our operations.

The Smith Family's service delivery of our programs and associated support functions and research are predominantly provided by our team members operating in Australia. Those team members are engaged to work in accordance with Australian laws.

We have assessed there to be a low risk of Modern Slavery in our workforce given our team members are covered by our Enterprise Agreement or a modern award; by the National Employment Standards which specify ten (10) minimum standards of employment; and by the processes The Smith Family has in place to support our team members, including:

- An employee Code of Conduct
- A comprehensive suite of Frameworks, Policies and Procedures including all HR matters
- Formal grievance reporting channel to address issues or concerns with treatment at work
- Regular anonymous Employee Engagement Survey

- Access to an Employee Assistance Program
- A Whistleblowing Policy accessible to employees, suppliers and contractors.

Our operations are also defined to include our funding sources as explained in [Section 3](#). The risk assessment confirmed that over 90% of our funding sources were Australian-based individuals, philanthropy or Government entities assessed as having very low Modern Slavery risk.

However, as described in *Figure 3*, our Corporate partners and Investments were identified as having higher potential Modern Slavery risk and subject to more rigorous risk assessment processes.

Figure 3: Funding source categories with risk of Modern Slavery practices:

| Funding sources | Category | Potential Modern Slavery risk |
|-----------------|--------------------|---|
| | Corporate partners | <ul style="list-style-type: none"> • Potential for Modern Slavery risks given the lack of visibility into the operations and supply chains of our Corporate partners. |
| | Investments | <ul style="list-style-type: none"> • Potential for Modern Slavery risks given the lack of visibility into the operations and supply chains of the local and foreign businesses managed through our investment portfolio. |

The steps taken to address the risks identified in our operations, specifically in relation to the funding sources included in *Figure 3*, are described in [Section 6](#) below.

Supply chains – risk assessment

The supply chain risk assessments during the Reporting Period confirmed that the potential Modern Slavery risk exists in a subset of our supply chains; namely advertising and marketing suppliers, ICT suppliers, landlord suppliers and cleaning services contractors.

The Modern Slavery risk assessments of our supply chains focused on suppliers with an annual expenditure over \$25,000 (11% of our suppliers have an annual expenditure over \$25,000, and this represents 87% of our total supplier expenditure), unless there were enhanced Modern Slavery risks due to geographic, industry sector or product and services risk, in which case those suppliers were also reviewed.

Figure 4 shows the supply chain categories in which potential Modern Slavery risk was identified.

Figure 4: Supply chain categories with risk of Modern Slavery practices:

| Supply chains | Category | Potential Modern Slavery risk |
|---------------|--|---|
| | Advertising and marketing | <ul style="list-style-type: none"> Higher-risk product and service category (branded goods). Higher-risk sector (print and promotional). Higher-risk geography (14 of 39 suppliers with annual expenditure over \$25,000 had overseas sourcing and/or complex global supply chains). |
| | Landlord suppliers and cleaning services contractors | <ul style="list-style-type: none"> Higher-risk product and service category. Vulnerable populations (base skilled, migrants). |
| | ICT systems and services | <ul style="list-style-type: none"> Higher-risk sector (IT procurement). Higher-risk geography (6 of 13 suppliers with annual expenditure over \$25,000 had overseas sourcing and/or complex global supply chains). |

The Finance team-led review confirmed that our established work program was well targeted and accordingly our Modern Slavery risk assessments and the due diligence work we have undertaken in the Reporting Period was focused on:

- New and renewing Corporate partners in accordance with our Donations Acceptance and Refusal Policy.
- Our Investments, led by our external investment manager under the direction of our CFO.
- Advertising and marketing suppliers with an annual expenditure over \$25,000.
- Information and Communications Technology (ICT) suppliers with an annual expenditure over \$25,000.
- Landlord suppliers for our large and medium size premises (suburban centre smaller office buildings or mixed retail/commercial buildings or larger); and cleaning services suppliers.

A new initiative was added to the work program for the Reporting period, namely to identify and conduct Modern Slavery due diligence on the top 10 higher-risk suppliers from supply chains not previously reviewed.

6 Actions taken and assessing the effectiveness of those actions

Our Modern Slavery work plan for the Reporting Period was informed by the work program established in previous years, and the Finance team-led review and functional team risk assessments described in [Section 5](#). Our Modern Slavery work plan comprised ten actions to be progressed and reviewed throughout the Reporting Period. The ten actions included in our work plan are summarised in *Figure 5*:



Figure 5: Our Modern Slavery work plan for the Reporting period:

The actions progressed in our Modern Slavery work program and how we measured the effectiveness of those actions, are summarised in *Figure 6*:

Figure 6: Our Modern Slavery work program for the Reporting Period:

| Action Item | Action and Effectiveness |
|---|--|
| Corporate partners (Established work program) | <p>Action: <i>Maintain and improve the Philanthropy team processes that manage Modern Slavery risk for Corporate partners.</i></p> <p>The Modern Slavery risk assessment and remediation processes outlined in our previous Modern Slavery statements continue to be rigorously applied.</p> <p>In the Reporting Period, the Philanthropy team maintained the Compliance Register for each of our 77 Corporate partners. The Compliance Register tracks:</p> <ul style="list-style-type: none"> • Donations acceptance and refusal reviews (20 of these reviews were conducted for new or renewing partners in the Reporting Period). • Other information gathered about our corporate partners relevant to these assessments (with 64 Modern Slavery statements prepared by our corporate partners retained on file). • Modern Slavery undertakings included in standard partner trader agreements supporting their cause related marketing activities (there were 6 new trader agreements in FY24). <p>Our 77 Corporate partners are presently assessed as low risk.</p> <p>Effectiveness: <i>We measure effectiveness for this action by confirming that:</i></p> <ul style="list-style-type: none"> • The team has maintained the level of information it records in the Compliance Register • Due diligence has been completed on new and renewing corporate partners; and • The Modern Slavery Working Group has oversight of the work done. <p>This work was completed in the Reporting Period.</p> |

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| <p>Investments</p> <p>(Established work program)</p> | <p>Action: <i>Work with our external investment manager to investigate and review our investment portfolio and enhance reporting on Modern Slavery.</i></p> <p>Our external investment manager completed the requested work in the Reporting Period, delivering an ESG and Modern Slavery report to provide transparency and insight into their management of our investment portfolio.</p> <p>The report identified 3 companies included in our investment portfolio that posed an inherent Modern Slavery risk. The investment manager has removed two companies from our investment portfolio, and one company remains subject to further investigation and review.</p> <p>Effectiveness: We measure effectiveness by reference to the actions taken by our external investment manager in responding to our requirements.</p> <p>As outlined above, the investment manager has prepared a report to address our requirements and varied our investment portfolio to remove companies identified as posing an unacceptable Modern Slavery risk.</p> <p>In FY25 we expect to determine whether our Investment Policy Statement requires further amendment to reflect our priorities regarding child safeguarding and modern slavery, and the nature and frequency of future investment portfolio reviews.</p> |
| <p>Advertising and marketing</p> <p>(Established work program)</p> | <p>Action: <i>Maintain and improve Fundraising team processes that manage Modern Slavery risk for advertising and marketing suppliers with an annual expenditure over \$25,000.</i></p> <p>In the Reporting Period, the team completed risk assessments for each of our 39 advertising and marketing suppliers with an annual expenditure over \$25,000.</p> <p>The team register capturing key supplier information and documenting the risk assessments was improved by including additional information to support the risk assessment process (links to the latest Modern Slavery statements, logs of completed Supplier Code of Conducts, logs of Modern Slavery checklists).</p> <p>36 of our 39 advertising and marketing suppliers were assessed as low risk, whilst 3 of the 39 suppliers will be subject to further review in FY25 after being assessed as medium risk.</p> |

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| <p>Advertising and marketing</p> <p>(Established work program)</p> | <p>Effectiveness:</p> <p>We measure effectiveness for this action by confirming that:</p> <ul style="list-style-type: none"> • The team has maintained its established risk assessment processes including their tracking register; • Due diligence has been completed on suppliers with an annual expenditure over \$25,000; and • The Modern Slavery Working Group has oversight of the work done. <p>This work was completed in the Reporting Period.</p> |
| <p>Landlord suppliers and cleaning services contractors</p> <p>(Established work program)</p> | <p>Action:</p> <p><i>Maintain and improve the Property team processes that manage the Modern Slavery risk for large and medium sized landlords and for cleaning services contractors.</i></p> <p>The Property team completed risk assessments for our 16 large and medium sized landlords, and on our 60 cleaners engaged directly or indirectly to service our premises, including 24 cleaners directly engaged on our standard contract.</p> <p>The Property team enhanced their due diligence process for landlords and cleaners to provide a more complete and transparent view of Modern Slavery risk.</p> <p>15 of 16 landlords providing premises management services to The Smith Family were assessed as low risk. 1 landlord is subject to follow up in FY25 due to no reply.</p> <p>58 of 60 cleaners were assessed as low risk. 2 cleaners are subject to follow up in FY25 due to no reply.</p> <p>The 24 cleaners on our standard contract terms (that is, where we have a direct contractual relationship) have been assessed as low risk; however, 5 cleaners have been asked for further information to confirm their compliance with our Modern Slavery requirements.</p> <p>Effectiveness:</p> <p>We measure effectiveness for this action by confirming that:</p> <ul style="list-style-type: none"> • The team maintains its established risk assessment and remediation processes including maintenance of their tracking register; • Due diligence is completed on large and medium-sized landlords and on our 24 direct cleaning contractors; and • The Modern Slavery Working Group has oversight of the work done. <p>This work was completed in the Reporting Period.</p> |

| Action item | Action and Effectiveness |
|--|--|
| ICT systems and services (Established work program) | <p>Action: <i>Maintain and improve the Digital and Transformation team processes that manage the Modern Slavery risk for ICT suppliers with an annual expenditure over \$25,000.</i></p> <p>The Modern Slavery risk assessment and remediation processes outlined in previous Modern Slavery statements continue to be rigorously applied.</p> <p>The Digital and Transformation team completed risk assessments for the 13 ICT suppliers with an annual expenditure over \$25,000. This comprised 11 existing suppliers and 2 new suppliers. The ICT Risk Register was maintained, with 13 suppliers, including the two new suppliers, assessed as low risk.</p> <p>The Smith Family continues to closely monitor an offshore ICT supplier who was included as a case study in our FY23 statement.</p> <p>Effectiveness: We measure effectiveness for this action by confirming that:</p> <ul style="list-style-type: none"> • The team maintains its established risk assessment and remediation processes including maintenance of their ICT Risk Register; • Due diligence is completed on ICT suppliers with an annual expenditure over \$25,000; and • The Modern Slavery Working Group has oversight of the work done. <p>This work was completed in the Reporting Period.</p> |
| Supply chains not previously reviewed (New initiative) | <p>Action: <i>Supply chain mapping to identify and conduct Modern Slavery due diligence on the top 10 higher-risk suppliers from supply chains not previously reviewed.</i></p> <p>This initiative, led by our Finance team, involved a supply chain mapping exercise to identify the top 10 higher-risk suppliers from supply chains that had not previously been subject to review.</p> <p>The review primarily identified smaller suppliers (i.e. suppliers with annual expenditure below \$25,000) from industries or product and service categories identified as having higher levels of Modern Slavery risk (marketing, printing, collateral, venues hire). It also</p> |

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| | <p>identified a large ICT supplier whose expenditure is recorded in program supplies (see Section 7: Case study).</p> <p>The ten potential higher-risk suppliers were assessed to be low risk for Modern Slavery. A supplier to one of our smaller programs will be subject to further review due to indirectly sourcing t-shirts and jackets from a higher risk region.</p> <p>Effectiveness: We measure effectiveness for this action by confirming that:</p> <ul style="list-style-type: none"> • The top 10 high-risk suppliers were identified through a risk mapping process that considered Modern Slavery risk factors. • The relevant relationship managers were engaged to conduct due diligence on suppliers, and these team members now have a greater understanding of Modern Slavery risk assessment; and • The Modern Slavery Working Group had oversight of the work done and shared learnings to the broader group. <p>This work was completed in the Reporting Period.</p> <p>This was an important new initiative that improved our Modern Slavery approach and will be embedded as part of our established work program each year.</p> |
| <p>Modern Slavery Working Group</p> <p>(New initiative)</p> | <p>Action: <i>Establish a Modern Slavery Working Group to develop, embed and deliver our Modern Slavery work program.</i></p> <p>In the Reporting Period, a Modern Slavery Working Group (“MSWG”) Terms of Reference was developed and approved, a Chairperson appointed, and representative membership determined. Membership comprises representatives from the functional areas that carry the highest risk of Modern Slavery practices.</p> <p>The MSWG meets monthly, with the inaugural meeting held in April 2024. The MSWG proved an effective forum and means to drive progress on the ten action items comprising our Modern Slavery work program in the Reporting Period.</p> <p>Effectiveness: We measure effectiveness for this action by confirming that the MSWG is in place and meeting regularly, that representatives are engaging with their functional teams to support understanding of team obligations and delivery of the allocated work, and that our</p> |

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| | <p>Modern Slavery work program is reviewed and successfully delivered.</p> <p>This work was completed in the Reporting Period.</p> <p>The MSWG is an effective way to engage functional teams on our commitment to minimising Modern Slavery risk, to ensure consistency of approach and to identify shared learnings and opportunities to enhance our work program in future years.</p> <p>In FY25 we expect to pursue greater engagement within each functional area, training for representatives and their key team members, and better tools and processes to support their contribution to our Modern Slavery work program.</p> |
| <p>Contract Management System</p> <p>(Flagged in FY23 statement)</p> | <p>Action: <i>Implement an automated Contract Management System for new suppliers and funders.</i></p> <p>To support improved governance and oversight of supply and funding contracts including onboarding processes, an automated Contract Management System was implemented for new supplier contracts over \$5,000 from March 2024. The team is also strongly encouraged to enter funding agreements into the new system.</p> <p>The introduction of this new system has had some early challenges, particularly related to team member familiarity and adherence to process. However, in the 4 months from implementation to June 2024, the system showed strong take-up with the review and approval of 51 supplier contracts and 24 funding agreements. 5 Modern Slavery checklists and 9 supplier information forms were also gathered in that 4-month period.</p> <p>A post-implementation review of contracts entered into the system, as well as the use of procurement forms available in the system (supplier information forms and Modern Slavery checklists) will be conducted in FY25.</p> <p>Effectiveness: We measure effectiveness for this action by assessing delivery of this project according to the project plan. This work was completed in the Reporting Period.</p> <p>Relevant teams are aware of the requirement to enter new contracts and funding agreements into the Contract Management System including the capture of supplier information forms and Modern Slavery checklists as applicable. This will support ongoing</p> |

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| | oversight of key supplier and funder relationships and ongoing due diligence of these relationships in future years. |
| Procurement policy (Flagged in FY23 statement) | <p>Action: <i>Track implementation and effectiveness of the Procurement Policy.</i></p> <p>A new Procurement Policy was launched in late FY23, with further work planned in FY24 to promote and use our Procurement Policy to embed a consistent approach to procurement, including supplier onboarding and Modern Slavery risk assessment.</p> <p>The procurement process for large and medium sized expenditures has been adopted, with improved process and oversight following the introduction of the Contract Management System in March 24.</p> <p>The action is not complete pending an internal review to confirm compliance and to consider opportunities to extend application to procurements under \$25,000 p.a.</p> <p>Effectiveness: We measure effectiveness for this action through team uptake and compliance with the new Procurement Policy, compliance with the recently introduced Contract Management System, and the completion of an independent review to confirm compliance.</p> <p>This work was partly completed in the Reporting Period. A review to confirm compliance with the Procurement Policy will be completed in FY25.</p> |
| Board and Executive oversight (Flagged in FY23 statement) | <p>Action: <i>Our Modern Slavery work program is subject to Board and Executive oversight.</i></p> <p>Our Modern Slavery work program and progress against that work program has been subject to periodic review by the Executive team and the Board Finance, Audit and Risk (FAR) Committee.</p> <p>The Modern Slavery Statement has been subject to Executive review and input, Board FAR Committee review, and endorsement by the Board each year.</p> <p>Effectiveness: We measure effectiveness of this action through confirming that the Modern Slavery work program, updates on progress on the work program, and the draft Modern Slavery statement are prepared and submitted for Executive Group and the Board FAR</p> |

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| | <p>Committee review as required in our Executive and Board schedules.</p> <p>This work was completed in the Reporting Period.</p> |
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7 Case Study

The following case study provides an example of our improved actions to assess and address our Modern Slavery risk in the Reporting Period.

Case study: Due diligence on a Top 10 higher-risk supplier.

The Smith Family sources a significant number of refurbished computers from a third party to enable the digital inclusion of its scholarship students.

Our supply chain mapping of supply chain categories that were not previously subject to review identified our top 10 higher-risk suppliers, and included our supplier of refurbished computers due to their industry sector and the magnitude of our spend. This supplier had not been reviewed previously as the expenditures were recorded in the program supplies supply chain category (not the ICT systems and services supply chain category which was already subject to review).

Our review confirmed that this Australian supplier was specifically selected as a supply partner due to their low-risk status (leading IT social enterprise operating wholly within Australia), strong environmental and social outcomes (refurbishment to avoid electronic waste, job creation for people from disadvantaged backgrounds), and overall value.

The Smith Family relationship manager requested information from the supplier to demonstrate their awareness of and commitment to managing Modern Slavery risk in their supply chain, and the supplier furnished their Modern Slavery Policy.

This Modern Slavery Policy was an indicator that the supplier was aware of and managing Modern Slavery risk. However, we sought assurance that the policy was supported by meaningful action and asked the supplier to provide further details regarding their Modern Slavery actions in the Reporting Period.

The supplier provided positive responses confirming action taken to assess and address Modern Slavery risk in the Reporting Period, in turn supporting our assessment that this supply chain carries a relatively low risk of Modern Slavery.

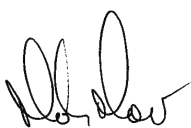
8 Looking forward

The Smith Family is pleased that progress has been made in our Modern Slavery work program during the Reporting Period. However, we acknowledge the need for ongoing work to be done to better understand and to more effectively identify and address Modern Slavery risk in our operations and supply chains.

We expect that our focus in the next Reporting Period will be to consolidate and embed the gains from the Reporting Period, to continuously improve our work program, and to leverage greater team engagement to identify further opportunities for improvement. Key actions we anticipate will be included in our work program for the next reporting period are:

- Continue to improve the standard annual work program established in previous years, including:
 - Supply chain mapping to identify and conduct due diligence on an additional 10 higher-risk suppliers not previously reviewed.
- Refine/expand the role of the Modern Slavery Working Group:
 - Improve standard tools used to support supplier engagement and risk assessment.
 - Greater involvement in development, tracking and review of the annual work program.
- Develop and deliver Modern Slavery training:
 - To Modern Slavery Working Group representatives.
 - To key team members from the functional areas with the highest Modern Slavery risk.
- Complete post implementation reviews on our Procurement Policy and Contract Management System.

This statement was approved by the Board of The Smith Family on November 29, 2024.



Nicholas Moore AO
Chairman

9 Annexure – Mandatory criteria:

The following table sets out the page numbers of the statement that address each of the mandatory criteria under s16 of the Modern Slavery Act 2018 (Cth).

| Mandatory criteria | Page number/s |
|--|---|
| (a) Identify the reporting entity. | 2-3 |
| (b) Describe the reporting entity's structure, operations and supply chains. | 4-7 |
| (c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity that it owns or controls. | 8-10 |
| (d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes. | 11-18 |
| (e) Describe how the reporting entity assesses the effectiveness of these actions. | 11-18 |
| (f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement). | Do not own or control any other entities. |
| (g) Any other information that the reporting entity, or the entity giving the statement, considers relevant. | 19-20 |

