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Country Fire Authority



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Statement Relating to Modern Slavery

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1. CFA's Commitment against Modern Slavery

CFA takes a strong stand against all forms of modern slavery and is committed to ensuring that its processes and operations seek to mitigate any risks of modern slavery. This statement outlines to the approach to this – not only in relation to internal operations but also the supply chain.

2. About CFA and its Supply Chain

2.1 Who we are

Country Fire Authority (CFA) is a Victorian State Government entity, established under the Country Fire Authority Act 1958 (Vic) and Governed by a Board of Authority. CFA Act governs the operation and structure of CFA, including its powers, duties and responsibilities of the organisation and its officers.

CFA's 1,210 volunteer brigades protect more than 2.2 million people in the Country Area of Victoria, covering 22.2 million hectares of the State. The CFA is responsible for emergency management and response across rural, regional and parts of peri-urban Victoria. CFA volunteers deal with complex structure fires and wildfires, provide and support motor vehicle accident first response in vast areas of the state, and attend incidents at complex industrial sites such as mining sites, gas plants and large battery storage facilities. CFA brigades also provide specialist fire and rescue services, critical community education and fire prevention initiatives. In addition, CFA volunteers are actively involved in empowering communities to be prepared for fire risk. They provide critical community fire education and take part in fire prevention initiatives. CFA volunteers are a part of the communities they protect.

For more information see the [CFA Strategy 2020-2030](#) and [Annual Report](#).

2.2 Supply Chain

CFA manages and oversees procurement activities to achieve value for money outcomes and complies with Victorian Government legislation and policy requirements through:

- a. effective procurement planning and management;
- b. clear processes, authorities, accountabilities and relationships critical in the effective management of CFA's procurement function;
- c. operations under defined structures, processes and roles that oversee the performance, procurement practices, risk and the effective delivery of value for money for CFA and for the state of Victoria through compliance with;
 - i. Victorian Government Purchasing Board (VGPB) Supply Policies in areas of: Governance, Complexity and Capability assessment, Market analysis and Review, Market approach, Contract management and Disclosure, and
 - ii. Ministerial Directions for Public Construction in Victoria and mandatory Instructions for Public Construction in Victoria;
- d. good governance practices that involve compliance with Victorian Government legislation and policy requirements, statutory obligations, responsibilities and duties, but also to produce evidence of compliance;

- e. the Standing Directions 2018 under the Financial Management Act 1994 .
 - i. Direction: 4.2.1.2 Agencies subject to Victorian Government Purchasing Board (VGPB) Coverage; and
 - ii. Direction: 4.2.4 Public construction accountability

In FY24, CFA's total supplier spend was over \$204M, with a relatively large supply chain in excess of 7,000 suppliers.

While CFA focuses on engaging and supporting local suppliers utilising Australian manufacturing where possible, there are instances where international supply chains are required to meet complex or niche requirements. CFA recognises that its local suppliers may themselves procure services and materials from outside Australia, including from geographies that are considered to have a high risk of modern slavery as identified by the Walkfree Global Slavery Index 2023.

During FY25-26 and FY26-27, an area of particular focus for CFA will be research and collaboration its tier 2 suppliers to analyse and understand the risk of modern slavery in this extended supply chain: that is, the subcontractors, supplier and manufacturers who CFA does not work with directly, but who are engaged by tier 1 (direct) suppliers. Our aim is to ensure that all suppliers respect human rights and can demonstrate a commitment to taking meaningful action to mitigate modern slavery risks.

CFA's spending occurs across a variety of categories including:

- Personal protective clothing and equipment (PPC and PPE)
- Professional services
- Contractors (including labour hire)
- Information technology systems and tools, maintenance and support
- Operational equipment purchase and rental
- Plant and equipment purchase
- Operational communications
- Office equipment and consumables
- Public construction
- Asset services
- Utilities
- Freight and logistics

2.3 Risks in the operations and supply chain of CFA

CFA Business Operations

CFA's workforce is located in Australia. Volunteers undertake volunteering in accordance with the Country Fire Authority Act and Regulations and Volunteer Charter. Staff are employed in accordance with relevant workplace law and applicable Enterprise Bargaining Agreements.

Procurement

CFA's Procurement Framework currently takes a risk-based and proportionate approach to undertaking checks on how potential and current suppliers are addressing the issue of modern slavery.

During FY25-26 and FY26-27, CFA will have a targeted focus on the following key product categories that have been prioritised as having a potential risk of modern slavery:

- **Laptops, Computers, and Mobile Phones:** The electronics industry is known to have a high risk of modern slavery, especially in the manufacturing of electronic components (Walkfree Global Slavery Index 2023, identified Electronics in the Top 5 at-risk imports by

product).

- **PPC and PPE:** The apparel industry is another industry that is known to have a high risk of modern slavery. Many of the world's largest clothing manufacturers source their products from countries where modern slavery is known to be a problem (Walkfree Global Slavery Index 2023, identified both Garments and Textile categories in Top 5 at-risk imports by product).
- **Construction Materials:** Globally, the property and construction sectors are considered high risk for modern slavery, due to elements around high-levels of sub-contracting and complex building material supply chains.

To help identify any potential modern slavery risk in the supply chain, CFA undertakes a range of procurement planning steps, supplier pre-qualification checks, contractual provisions and ongoing monitoring of suppliers. The approach taken varies according to the category of spend, source country and other risk factors identified in the procurement planning phase for consideration and management through the supply chain assurance assessment actions. In any case, CFA can choose not to work, or cease work, with suppliers who do not act to meet our expectations.

3. Risk Mitigation and Remediation

CFA continues to work with colleagues in the Victorian Government, whose State Purchase Contracts and Registers are used for many of purchases and whose support is essential in combatting modern slavery. This may be through the Supplier Code of Conduct Policy and the Uniform and PPE Policy, as follows;

- The Supplier Code of Conduct (the Code) describes the minimum standards that our Suppliers must achieve, in order to establish and maintain a business relationship with, or on behalf of, the Victorian State Government. Model contract clauses support the application of the Code. The action of submitting an offer or signing a contract with government indicates that a Supplier agrees:
 - to meet the standards set out in the Code; and
 - to comply with provisions relating to implementing and enforcing the Code.
- It is a requirement for all Victorian Government departments and agencies to buy uniforms and PPE manufactured locally and ethically, whenever possible, for Victorian Government employees. For locally manufactured uniforms and personal protective equipment they must be bought from suppliers registered on the Ethical Supplier Register.

3.1 Supply Chain Due Diligence

Through responsible procurement planning, strategic sourcing, category management and stakeholder engagement, CFA seeks to reduce several category risks during FY25-26 and FY26-27.

Supply chain assurance is built into CFA's tendering processes. Through this process CFA seeks to:

- Include Supplier Code of Conduct provisions in all market approach documents, with such requirements embedded in all CFA market approach templates.
- Include Supplier Code of Conduct model clauses in all contractual arrangements, with such clauses embedded in all standard CFA contract templates.
- As required, confirm compliance to Supplier Code of Conduct contract clauses to confirm that the supplier understands and commit to and comply with the Code if selected to

supply the requirement, including reporting instances of non-compliance of the code or if a State employee has breached the Victorian Public Sector Code.

- Request suppliers declare the details of their subcontractors, suppliers and manufacturers to increase our understanding of the extended supply chain and identify areas of high priority for review and remedial action if necessary.

If a purchase is flagged as having a high modern slavery risk (due to the category of spend, source country and other risk factors identified in the procurement planning and supplier evaluation phases), this will be recorded in applicable contract management plans, where any modern slavery training or remedial actions that need to take place can be recorded and tracked.

Through this process suppliers will be encouraged to raise any concerns, discuss or seek clarification accordingly to any elements of the Code with CFA or the primary State contact in relation to the goods or services or the construction works and services, they are providing.

Consistent with relevant modern slavery legislation, suppliers are expected to proactively identify, address and – where required by legislation – report on risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices) in their business operations and supply chains.

Policy Framework

CFA's policy framework supports our commitment to respect human rights, and address risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices). Our key policies relevant to modern slavery are set out below:

Policy	Relevance to modern slavery	Target Risk	Communication Strategy
VPSC Code of Conduct and CFA Behavioural Standards	<p>The Victorian Public Sector Commission (VPSC), of which CFA is a part, has strict requirements in relation to behaviour and integrity. These requirements are set out in the VPSC Code of Conduct for Victorian Public Sector Employees (Code) and are binding on all CFA staff including CFA Board members.</p> <p>The Code requires that VPS employees report unethical workplace behaviour to an appropriate authority.</p> <p>The policy sets out the required standards of behaviour for all CFA members and labour hire contractors whenever they are performing work for or on behalf of CFA or undertaking CFA activities.</p>	<p>Operations (Workforce) Supply Chain</p>	<p>CFA's Behavioural Standards is published on our intranet with reference to the publicly available VPSC Code of Conduct.</p> <p>Training on the VPS Code of Conduct is mandatory and requires completion by all employees annually.</p>
Risk Management Policy and Framework	<p>CFA's risk management policy and framework outlines the processes in place for effective risk management practices throughout the organisation, ensuring that CFA is managing risks effectively to achieve organisational goals, objectives, and outcomes.</p> <p>CFA uses Protecht system as a dedicated Risk Management System for risk management and internal audit. The system allows for the capturing and monitoring of risks, controls and associated actions. This may include any modern slavery risks identified within CFA's Operations or Supply Chains.</p>	<p>Operations (Workforce) Supply Chain</p>	<p>CFA's risk management policy and framework are available within our online policy library.</p>
Procurement Policy and Procedures	<p>CFA's Procurement policy and procedure sets out how CFA manages and oversees procurement activities to achieve value for money outcomes that comply with</p>	<p>Supply Chain</p>	<p>CFA's procurement Policy and framework are available within our online policy library.</p>

	<p>Victorian Government legislation and policy requirements.</p> <p>The policy and procedures outline CFA's procurement principles, that are designed to ensure that procurement activities are;</p> <ul style="list-style-type: none"> · conducted in a manner that is transparent and fair for suppliers, · enables value for money outcomes for CFA, · complies with legislative requirements, and · promotes the efficient and effective use of resources. <p>The Supplier Code of Conduct and provisions for ethical purchasing through the Uniform and PPE Policy are incorporated within CFA's policy and procedures, along with Health and Safety assessment requirements to comply with Ministerial Directions for Public Construction in Victoria and mandatory Instructions for Public Construction in Victoria</p>		
Supplier Code of Conduct	<p>The Victorian State Government is committed to ethical, sustainable and socially responsible procurement. To support this commitment, the Victorian Government has implemented a Supplier Code of Conduct which must be reviewed and adhered to by all suppliers that engage with the Victorian Government.</p> <p>The Supplier Code of Conduct describes the minimum expectations that suppliers must achieve to meet in the areas of:</p> <ul style="list-style-type: none"> a. integrity, ethics and corporate governance b. labour and human rights e. health, safety and security f. environmental sustainability <p>The Supplier Code of Conduct is complimentary to and supports the objectives of the modern slavery legislation.</p>	Supply Chain	The Supplier Code of Conduct is referenced in CFA's Procurement Policy and Procedures, and available on the Victorian Governments Buying for Victoria website
Local Jobs First Victorian Industry Participation Policy - Guide to procuring uniforms and personal protective equipment	<p>All Victorian Government departments and agencies are to buy uniforms and personal protective equipment manufactured locally and ethically, whenever possible, for Victorian Government employees.</p> <p>The Guide to procuring uniforms and personal protective equipment applies to all new, amended and replacement contracts regardless of value.</p> <p>The ethical supplier register lists registered suppliers of locally manufactured corporate clothing, uniforms, workwear and personal protective equipment, who have (or are in the process of having) their local manufacturing supply chain ethically:</p> <ul style="list-style-type: none"> · accredited by Ethical Clothing Australia or · verified by an independent third party 	Supply Chain	The Guide to procuring uniforms and personal protective equipment is referenced in CFA's Procurement Policy and Procedures, and available on the Victorian Governments Buying for Victoria website
Health, Safety and Wellbeing Policy	Our Health, Safety and Wellbeing Policy sets out to clearly articulate CFA's obligation and intent to protect the health, safety and wellbeing (HSW) of CFA	Operations (Workforce)	Training on the Health, Safety, Environment and Wellbeing is mandatory and requires completion

	<p>members.</p> <p>The Health, Safety and Wellbeing Policy supports and encourages a safety-first culture where CFA members are openly encouraged to report hazards, incidents including near misses, without fear of reprisal to ensure root causes are identified to enable measures to be actioned to eliminate recurrence.</p>		<p>by all employees annually.</p>
Complaints Management	<p>CFA places a high level of importance on the way it conducts procurement processes and how it interacts with the market. CFA procurement activities will apply fair, equitable and non-discriminatory complaint handling procedures.</p> <p>If there is a concern about a procurement process or probity matter raised by a supplier, CFA has a dedicated procurement complaint handling process available. CFA's Procurement Complaint Process outlines how CFA will capture the complaint, the process to be taken by CFA and potential investigation timelines. This may include reportable conduct where human rights violations, including modern slavery, have been identified or non-compliance with the Supplier Code of Conduct need to be handled.</p>	<p>Operations (Workforce) Supply Chain</p>	<p>CFA's Complaint handling process is referenced in CFA's Procurement Policy, and available on CFA's public website procurement page.</p>

3.2 CFA's Future Focus

CFA recognises modern slavery is a global problem and takes accountability for its role in identifying and remediating these risks in our operations and particularly in the extended supply chain.

CFA will continuously monitor its supply chain for any changes or new risks, by continuing to embed an integrated modern slavery risk assessment into our procurement processes, to enable an automatic consideration for anyone at CFA purchasing works, goods or services. It will continue to refine the approach through research and supply chain risk mapping. By working together with suppliers to address modern slavery risks, CFA aims to create a more responsible and sustainable supply chain.

During FY25-26 and FY26-27, CFA will extend work already completed to implement anti-slavery processes into tendering and contract processes, by looking to enhance capability and reduce modern slavery risk through supplier partnerships and collaboration. This will be through the introduction of a buyer's toolkit, with a scalable supplier screening questionnaire and assessment dependant on its risk category, to help capture the number of suppliers who have completed modern slavery training (and/or attended awareness sessions) and improve our understanding of Tier 2 suppliers. Further to this, CFA has introduced a dedicated Infrastructure Services Management Committee, where responsible investment considerations can be assessed for environmental, social and governance risks and opportunities in the decision-making process, which can include further identification of modern slavery risks.

Strategy

CFA follows the Buying for Victoria Supplier Code of Conduct Policy in relation to procurement of works, goods or services.

The procurement of works, goods or services by CFA aligns to the Victorian Government Purchasing Board (VGPB) policies and directives established under the Financial Management Act 1994 (Vic). More information about CFA procurement can be found [here](#).

CFA's strategy to address the potential risk of modern slavery in our operations and supply chain,

includes focus to deliver key milestones against the following:

Governance

Ensure our framework and policies enable modern slavery response, including oversight and monitoring.

Awareness and Capability

Raise awareness of modern slavery in the organisation through mandated VPS Code of Conduct, Health, Safety, Environment and Wellbeing training. A scalable buyers toolkit will be developed to provide employees with the knowledge and tools to identify and manage the risks of modern slavery in their work.

Supply chain risk assessment and risk management

Understand our supply chain risks by identifying category of spend, source country and other risk factors where a modern slavery response should be focused, to implement appropriate due diligence processes to manage these risks.

Complaints and dispute management

CFA’s complaints and dispute processes effectively address modern slavery related incidents or allegations and facilitate remediation where required.

In addition to the Policy Framework below, The Protected Disclosure Act 2012 (former Whistleblowers Protection Act 2001) can be accessed on Victorian Legislation website.

Collaboration

Identify and leverage opportunities for meaningful engagement with suppliers, external stakeholders and industry peers to strengthen CFA’s modern slavery risk management response.

This engagement has or may be in the form of:

- attend public and private sector information and reference groups with public officials and senior representatives from industry;
- engage subject matter experts in the industry (consultants and contractors);
- conduct events, such as forums and industry briefings, to facilitate exchange of information; and
- attend trade/industry shows.

4. Assessing Effectiveness

Assessing effectiveness is complex and CFA is continuing to explore opportunities to strengthen our approach. As CFA’s modern slavery response matures, it will gain greater understanding around the most appropriate progress and effectiveness measures.

Area	Key measures
Awareness and Capability	<ul style="list-style-type: none"> • Percentage of CFA employees who have completed VPS Code of Conduct, Health, Safety, Environment and Wellbeing and CFA Behavioural Standards training. • Development of a Buyer’s Toolkit with model clauses to enable scalable assessment of modern slavery dependant risks. • Within the Buyer’s Toolkit introduce additional supplier questionnaire to measure their ability to meet the

	<p>requirements of the code of conduct within the RFX process.</p> <ul style="list-style-type: none"> Once the Buyer's Toolkit has been implemented, introduce measures on the number of suppliers who have completed modern slavery training and/or attended awareness sessions.
Supply chain risk assessment and risk management	<ul style="list-style-type: none"> Number of modern slavery risks recorded within CFA's Contract Register, and successful actions to mitigate risks as detailed in applicable contract management plans.
Complaints and dispute management	<ul style="list-style-type: none"> Number of modern slavery issues / incidents raised for investigation. Number of issues satisfactorily resolved with audit conducted and / or agreed action plan.

5. Consultation with Related Entities

CFA does not control or own any other entities.

6. Approval

CFA is confident that the steps taken this year have built a strong foundation for a robust framework to mitigate the risk of modern slavery. CFA is committed to continually improving its approach, partnering with stakeholders and working to eradicate modern slavery.

This statement has been approved by the Board of the Country Fire Authority 27/10/2025.



Jo Plummer
Board Chair