
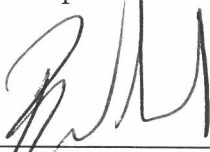


Some information that was previously on page seven (7) of this Modern Slavery Statement has been removed due to having contents of sensitive information, that for privacy reasons, we do not wish to publish to the Modern Slavery Register. This sensitive information, related to details of individual suppliers to St Philip's, was removed on the 11th of August, 2023.



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Jacques Cronje  
Chief Financial Officer  
St Philip's Christian Education Foundation Ltd.



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Brian Weld  
Deputy Chief Financial Officer  
St Philip's Christian Education Foundation Ltd.

Friday, August 11, 2023



## **St Philip's Christian Education Foundation Ltd - Modern Slavery Statement for the reporting period 1 January 2022 to 31 December 2022**

### **1 St Philip's Christian Education Foundation Ltd.'s Structure, Operations and Supply Chains**

St Philip's Christian Education Foundation Ltd (ACN 002 919 584) (St Philip's) delivers educational services via early learning centres, primary and secondary schools as well as tertiary education.

St Philip's is structured as an Australian public company, limited by guarantee and registered with the Australian Charities and Not-for-profits Commission. Its registered office is:

St Philip's Christian College  
57 High Street, Waratah  
NSW 2298

Details regarding the entities St Philip's controls are contained in **Appendix 1**.

The main operations of St Philip's include the provision of educational services via four Kindergarten to year 12 schools, two special schools and six early learning centres. St Philip's operations also include the facilitation tertiary education in conjunction with a recognised tertiary education provider for the preparation of future teachers.

As at 31 December 2022, St Philip's employed 750 permanent staff to carry out its operations.

St Philip's operations are located in New South Wales, Australia.

- Arrangements with suppliers are both short-term and part of longer-term relationships. Many of these latter relationships have been stable for many years.
- St Philip's has a revenue sharing arrangement with The School Locker in the provision of school uniforms to schools and early learning centres.

St Philip's procures goods across several broad procurement categories, including:

- facilities management (including cleaning, security, landscaping, plant and equipment maintenance and inspections)
- food and catering products



- utilities
- office, classroom and playground equipment
- office supplies (including books and stationery)
- phones, computers and other technological devices
- textiles (school uniforms)
- building and property development
- professional services

The countries/regions where St Philip's suppliers are located include Australia, Asia, the Americas and Europe.

## **2 Risks of Modern Slavery Practices**

St Philip's has performed an assessment of its operations and supply chains, including the entities that the organisation controls, to evaluate the risk of modern slavery practices. No instances of modern slavery contravention were detected during the course of the assessment. However, the assessment provided a useful basis to review structural elements in control functions within the various supply chains. These learnings have now been incorporated in the planning for the College's progressive risk mitigation strategy and actions.



The overarching Risk Framework can be seen below.



### In Our Operations

Based on this assessment, we identify a low risk of modern slavery in our operations. Our organisation has strong employment policies based on the existing Australian employment laws, awards and other regulations within the sector. An area of potential modern slavery risk is through our mission and service-learning opportunities both domestic and international.

Our schools seek to give our students the opportunity to look beyond themselves and participate in service-learning opportunities to remote Australian communities as well as overseas. This review has identified that core concerns of this program include provision of funds to overseas missions and schools and 'voluntourism'.

### In Our Supply Chain

In assessing the risk of modern slavery practices within our supply chain, several factors were considered, including:

- Geography
- Industry practices
- Labour status

Based on the factors above, we identify that modern slavery risk may exist in the following areas within our supply chain.



## **Supply Chain**

## **Potential Modern Slavery Risk**

Cleaning Services	Migrant workers with poor employment condition/workers' rights and compensation/debt-bondage situation with the employer (SPCEF external contractor)
Food Services	Food products in the cafeteria that are sourced from high-risk countries with histories of poor labour legislations and practices (rice, chocolate etc.)
ICT	Goods and equipment produced in factories in countries with histories of poor labour legislations and practices
Uniform	Goods and equipment produced in factories in countries with histories of poor labour legislations and practices (SPCEF external contractor)
Capital Works Development	Goods and equipment produced in factories in countries with histories of poor labour legislations and practices and workers with poor employment condition/workers' rights and compensation/debt-bondage situation with the employer (SPCEF external contractor)
Grounds and Building Maintenance	Goods and equipment produced in factories in countries with histories of poor labour legislations and practices and workers with poor employment condition/workers' rights and compensation/debt-bondage situation with the employer (SPCEF external contractor)

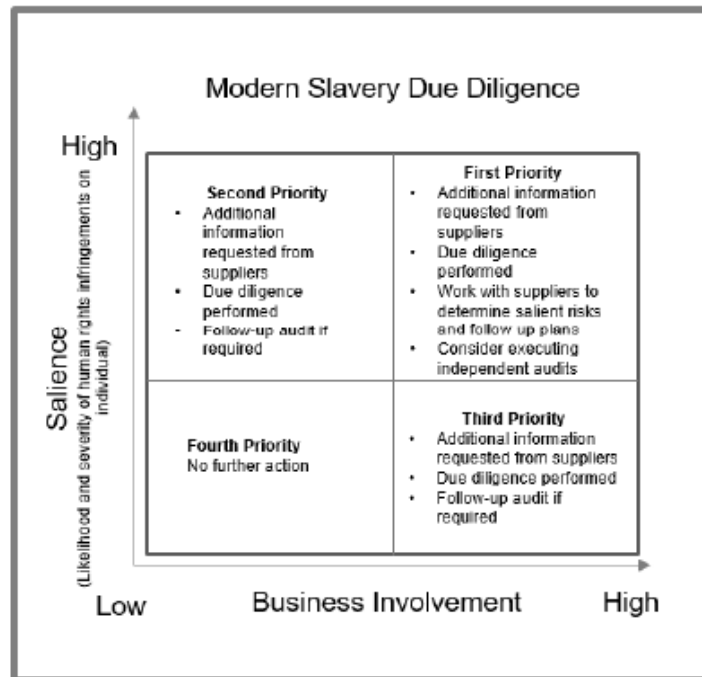
St Philip's considers there is a relatively low risk of it causing, or contributing to, modern slavery in its operations and supply chains.

As an Australian provider of educational services, St Philip's considers its operations and supply chain to be relatively simple in comparison to many other industries. St Philip's employs most of its staff directly on permanent contracts and is not directly involved in overseas labour or manufacturing.



St Philip's supply chain includes cleaning, electronics, grounds and building maintenance and textiles. St Philip's recognises that these are high risk sectors and that by engaging these services through a third party, we may be indirectly contributing to modern slavery practices.

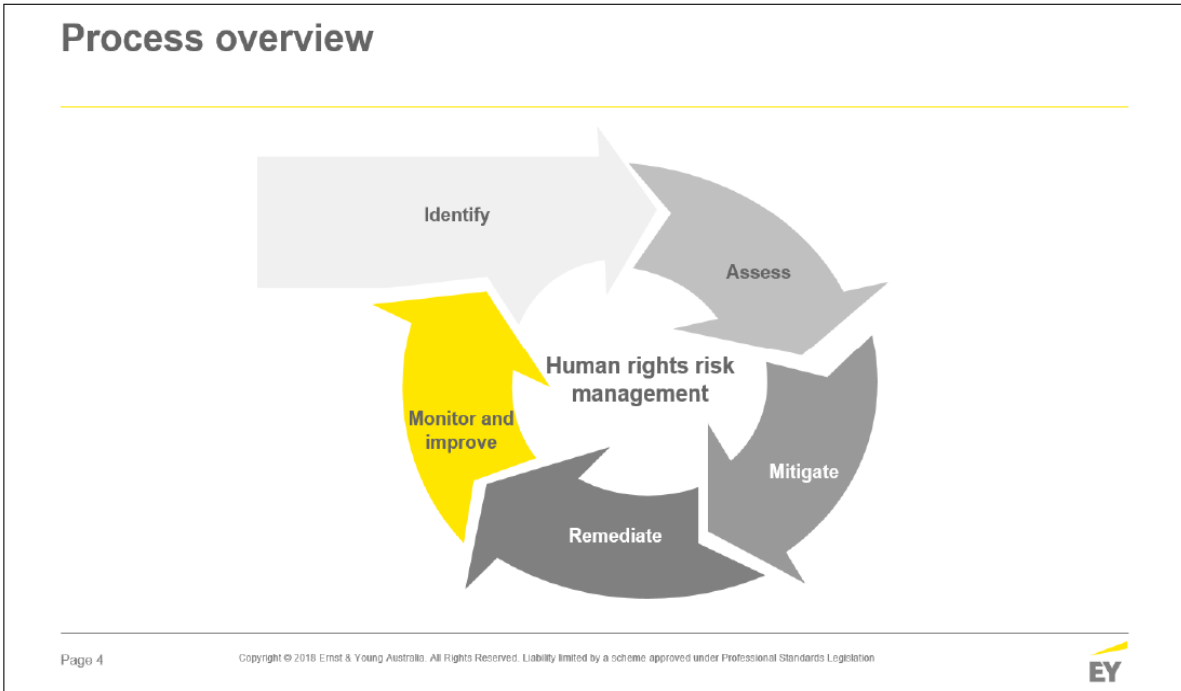
St Philip's also recognises there is risk of it being indirectly linked to modern slavery, as our suppliers may source products or raw materials from overseas companies connected with modern slavery.





**St Philip's  
Christian Education**  
FOR THE WHOLE OF LIFE

By way of overview of our approach to risk identification and mitigation, see charts below, adopted from Ernst & Young.



### A practical roadmap

	Identify	Assess	Mitigate	Remediate	Monitor & Improve
Operations	<ul style="list-style-type: none"> <li>Map business activities, locations and relationships to consider slavery risk in operations</li> </ul>	<ul style="list-style-type: none"> <li>Consider assessing risks as part of a broader human rights salience assessment in line with the UNGPs</li> </ul>	<ul style="list-style-type: none"> <li>Review policies and processes to strengthen governance and controls around high risk areas</li> </ul>	<ul style="list-style-type: none"> <li>Focus on safety and wellbeing of rights holders</li> <li>Utilise industry and NGO collaborations</li> </ul>	<ul style="list-style-type: none"> <li>Ensure risks are present on corporate risk registers</li> <li>Determine how effectiveness of measures will be monitored</li> </ul>
Supply chain	<ul style="list-style-type: none"> <li>Map supply chain at a high level to determine riskiest areas.</li> <li>Identify tier 2, 3 (etc.) of your suppliers (priorities based on risk).</li> </ul>	<ul style="list-style-type: none"> <li>Risk assessment of suppliers (at appropriate level in the supply chain) based on commodity and country risk factors (available through GSI etc.), leverage what you already know about the supplier</li> <li>Segment suppliers into groups based on level of risk to rights holders</li> </ul>	<ul style="list-style-type: none"> <li>Map existing controls across relevant functions</li> <li>Focus on ensuring identification of modern slavery risks and incidences</li> <li>Enable capacity building</li> <li>Consider more fundamental business model changes</li> </ul>	<ul style="list-style-type: none"> <li>Inform authorities as appropriate</li> <li>Consider UNGP framework of leverage (cause, contribute, directly linked)</li> </ul>	
Compliance	<ul style="list-style-type: none"> <li>The business must disclose the risk of modern slavery in its operations and supply chain</li> </ul>	<ul style="list-style-type: none"> <li>The business must disclose the actions taken to <b>assess</b> and address the risks, including <b>due diligence</b> and <b>remediation</b></li> </ul>			<ul style="list-style-type: none"> <li>The business must describe how it is assessing the effectiveness of its actions</li> </ul>

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## Risk mapping

**Mapping business processes to identify risks requires:**

- ▶ Internal and external stakeholder engagement
- ▶ An understanding of business processes in theory and in day-to-day practice
- ▶ Awareness of emerging issues within the industry locally and globally
- ▶ Understanding of human rights (per the Universal Declaration and other relevant covenants)
- ▶ Data analysis for risks across local and global operations and supply chains

Example of basic internal process mapping

Example of mapping broader human rights risks across the value chain

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## Actions to Assess and Address Risks

St Philip's will endeavour to undertake a number of actions to assess and address the risks of modern slavery throughout its operations and supply chains. These could include, but are not limited to:

- Screening existing and new suppliers for modern slavery risks, including by reviewing their Human Rights Impact Assessments and WH&S inspections;
- Consistently mapping operations and supply chains;
- Forming a working group responsible for assessing and addressing modern slavery risks, involving different roles such as HR, Finance, Legal, Risk, senior leadership;
- Requesting information from suppliers about sub-suppliers, including country of origin;
- Engaging with suppliers about how they are addressing their modern slavery risks, for example by requiring them to complete the questionnaire (see Appendix 2). St Philip's screens all existing and new suppliers for accurate payment information through a program called EFTsure. As part of this software, St Philip's is able to ask that each supplier be sent the questionnaire in Appendix 2, and in particular the companies from which procurement of goods and services is greatest (previous top supplier chart);
- Tracing the source of products;



- Internal audits of supplier screening;
- Introducing a policy to allow people to safely report modern slavery risks;
- Incentivising entities to improve performance (e.g., future business opportunities);
- Ending business relationships with entities identified as causing risk;
- Building partnerships with business peers, community groups and industry bodies to improve understanding modern slavery risks;
- Consistently reviewing and improving policies and procedures, including supplier codes of conduct and sourcing policies;
- Introducing internal training on modern slavery, policies and processes for incident reporting;
- Addressing practices that may lead to modern slavery such as unlawful wage deductions, sham contracting, underpayment;
- Obtaining contractual warranties which ensure that there are no modern slavery practices in the supplier's business and that necessary policies and processes have been implemented;
- Obtaining a contractual right to request compliance-related information and the right to second party audit of suppliers at St Philip's discretion;
- Specifically requiring compliance with modern slavery legislation in standard terms and conditions and contracting agreements.

### In Our Operations

St Philip's has performed an assessment of its operations and supply chains, including the entities that the organisation controls, to evaluate the risk of modern slavery practices. No instances of modern slavery contravention were detected during the course of the assessment. However, the assessment provided a useful basis to review structural elements in control functions within the various supply chains. These learnings have now been incorporated in the planning for the College's progressive risk mitigation strategy and actions.

### In Our Supply Chain

In the period of February to October 2023, our Finance and Audit Committee has planned to review all existing employment and procurement policies to identify all potential gaps and inconsistencies with the current Modern Slavery Act's requirement.



In particular relation to addressing risks around modern slavery, see further extracts from our Risk Management Matrix:

3. Governance	Poor governance resulting in poor decisions that adversely affect leadership, staff, students and parents.	High/ Major	<p>Ensure an effective Board is in place and adequately trained and supported in their role.</p> <p><b>NESA Requirement 3.9.3 Proper Governance – Policies and Procedures</b> A registered non-government school must have policies and procedures for the proper governance of the school in place.</p> <p>The 'responsible persons' for a registered non-government school must have in place and implement policies and procedures in relation to, but not limited to, the following:</p> <ul style="list-style-type: none"> <li>▪ a school charter or document identifying the governance structure of the school and the respective authority, role and responsibilities of each of the school's 'responsible persons' and any other person or body concerned in the management of the school</li> <li>▪ a delegations schedule to             <ul style="list-style-type: none"> <li>- identify the respective authority within the governance structure</li> <li>- describe the process for withdrawing a delegated authority</li> </ul> </li> <li>▪ a document to set out supervisory arrangements and reporting requirements for the school's 'responsible persons' including any governing body and school executive</li> </ul>	<ol style="list-style-type: none"> <li>1. CEO ensures that the Board is advised of its responsibilities, that the Board is inducted and trained and that adequate reporting of school matters is made available to the Board.</li> <li>2. CEO ensures 'Responsible Persons' are updated on their responsibilities.</li> <li>3. Board approves the Governance Handbook and updates, the Delegations Schedule, Compliance Calendar, Risk Management Framework.</li> <li>4. Principals report directly to the Board each term in a written report and present to the Board each semester.</li> <li>5. BMs prepare reports for the CFO.</li> <li>6. CFO reports to the Finance and Audit</li> </ol>	The Governance Handbook is being updated currently To be submitted to the Board for approval in Term 2.	
			<ul style="list-style-type: none"> <li>▪ a code of conduct for the school's 'responsible persons'</li> <li>▪ maintenance of records of governance decisions and actions made by the school's 'responsible persons', including minutes of formal meetings of the school's 'responsible persons', on and from 1 September 2014 and retaining such records for a minimum period of seven (7) years before archiving</li> <li>▪ a document describing the school's legal compliance process to facilitate the school's compliance with all relevant legislation and reduce any risk of non-compliance</li> <li>▪ a document describing the school's risk management framework or plan for developing, implementing and reviewing risk management strategies in relation to strategic direction, governance, operation and finance and the associated risk register.</li> </ul> <p><b>See the Governance Handbook, Constitution, Delegations Schedule, Compliance Calendar, Risk Management Framework.</b></p>	Committee and the Board.		
4. Legal Compliance	Lack of attention to compliance matters resulting in a breach	High/ Major	<p>Have in place a Compliance Program for the organisation that all schools and activities adhere to and report against. Ensure all school compliance requirements are known and action is taken to fulfil them:</p> <p><b>See Compliance Calendar</b></p>	<ol style="list-style-type: none"> <li>1. People, Governance and Risk Committee / DCEO ensures that the Compliance Program is in place and that persons responsible are adequately trained and know and carry</li> </ol>	Compliance Calendar from AIS currently being adopted and surfaced up through CompliSpace for add another layer of assurance.	
				<ol style="list-style-type: none"> <li>2. Principals and Business Managers responsible to follow the AIS NSW Compliance Calendar and report any oversights.</li> </ol>		



15. Australian Government Compliance	Failure to fulfil obligations resulting in withdrawal of funding.	Very Unlikely/ Extreme	Ensure compliance with the requirements for Australian Government funding in the following areas: 1. National Goals 2. Annual Reporting 3. Benchmark Testing 4. National Safe Schools Framework 5. Financial Questionnaire  <b>See Annual Report, Compliance Certification and Financial Questionnaire</b>	1. CFO and Business Managers ensure that the Financial Questionnaire is completed annually. 2. Principals ensure that Annual Reports are furnished as required. 3. CFO and Principals report to the Board regularly.	Annual Reports for each school to be submitted in June.	
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16. Major Building Works	Inferior and unnecessary work. Cost overruns. Failure to pay progress payments. Inadequate OHS provisions by the builder resulting in injury to worker, student or the public	Likely/ Major	Ensure the following are in place: 1. Architect's supervision of project 2. Quantity Surveyor's estimates 3. Budget to actual report during the project 4. Architects reports to the PCG 5. Site Meeting with Architects and Builders during projects 6. Building handover procedures from the builders to the school at conclusion of the project 7. Builders warranty and no fault period 8. Builders WHS Plan  <b>See Site and Building Committee Minutes, Architect's instructions for variations, Monitoring reports from the Quantity Surveyor and the Builders WHS Plan</b>	1. The Project Control Group (PCG) oversees all major projects on behalf of the Building and Infrastructure Committee and Board of Directors for approval. 2. The Director of Infrastructure Development, College Architect and Building Services Manager to be involved in all projects. 3. Project Briefs are prepared for major projects and approved by the PCG. 4. All Major Projects are presented to the Building and Infrastructure Committee and approved by the Board before commencement. 5. Site meetings are established involving Central Office, school and Board reps for all Major Projects.	Status reports supplied to the Board regularly.	
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St Philip's recognises that a multi-stage approach is needed to mitigate any potential modern slavery risk and related issues within our operations and supply chain.

Our multi-stage approach is set out below:

1. Identification and Review
  - a. Identification of high-risk goods and services procurement origin
  - b. Treatment of risk within the high-risk supply chain as captured in our initial risk assessment review
2. Planning
  - a. Proposed amendments to the current procurement and employment policies
  - b. Communication and education of modern slavery risk and concept to College staff
  - c. Adoption of the proposed amendments
3. Implementation
  - a. Application of the amended procurement and employment policies with modern slavery requirements
  - b. Rigorous review and analysis on each supply chain division for compliance with the new policies
4. Monitoring and Control
  - a. Regular audit and monitoring of our supply chain divisions



#### **4 Effectiveness of actions to assess and address risks**

St Philip's is committed to continuously improving its systems and processes to effectively assess and address modern slavery risks in an efficient. To this end, St Philip's has instituted the following.

For the identification and planning stage, we are relying on previous policy records, documents, and consultation with key personnel to ensure practicable compliant policies can be developed for the school. We will use a combination of awareness surveys and modern slavery risk reporting mechanisms to ensure the effectiveness implementation and monitoring stage.

The People, Governance & Risk committee has been assigned to prepare and guide the process of development, implementation and control of modern slavery risk mitigation. This group will report directly to the board on content and progress.

St Philip's is committed to continuously improving its systems and processes to effectively assess and address modern slavery risks in an efficient. To this end, St Philip's will endeavour to:

- Set up an annual senior management review of St Philip's actions;
- Ensure risk assessment processes are kept up to date;
- Established a feedback process;
- Conduct internal audits/monitoring actions taken;
- Record the actions taken and track their impact;
- Keep up to date with trends in modern slavery risks and how cases are handled;
- Develop modern slavery KPIs which could cover the number of modern slavery training programs delivered, the number of complaints resolved through a grievance mechanism, the number of contracts that include modern slavery clauses, the number of actions taken with suppliers to improve their ability to respond to modern slavery risks.



## **5 Consultation process**

St Philip's Christian Education Foundation Ltd consulted with all the operational campuses in Australia and surveyed current procurement practices. This Modern Slavery Statement was approved by the Board of Directors of SPCEF on 23 February 2023.

In preparing this Statement, St Philip's has consulted with each of the entities identified in Appendix 1

**Signature**

**Name: Brian Weld**

**Position: Deputy Chief Financial Officer**

**Date: 5/15/2023**





## Appendix 2 - Supplier Questionnaire

Supplier contact details		
Organisation name		
Organisation address		
Australian Business Number		
Parent company		
Contact person		
Contact email		
Contact phone		
Date of Questionnaire completion		
Additional documentation		
Is your organisation required to report under the <i>Modern Slavery Act (Cth) 2018</i> ? If so, please attach a copy of your modern slavery statement(s).		
Is there any other additional documentation you have attached to this questionnaire? If so, please list them here.		
Supplier agreement		
Supplier confirms that it has read St Philip's Supplier Code of Conduct and agrees with its statement of requirements, and commits to comply with them	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Supplier will be responsible for implementing and monitoring improvements designed to achieve conformance with the St Philip's Supplier Code of Conduct	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Organisation		





1.	<p>How much visibility does your organisation have over your supply chain? Please select one of the below and explain why you selected this option:</p> <p><input type="checkbox"/> <b>High:</b> You have mapped the full supply chain for key products and services used by your organisation and have identified key suppliers at all levels of your supply chain.</p> <p><input type="checkbox"/> <b>Moderate:</b> You have identified major Tier One suppliers and have partially or fully mapped the supply chains for key products and services of your supply chain.</p> <p><input type="checkbox"/> <b>Developing:</b> You have identified major Tier One suppliers. You have very limited or no visibility of your supply chains below the Tier One level.</p>
2.	<p>Does your organisation have a policy or policies in place to deal with modern slavery?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If the answer is yes, please provide details of, or a copy of, the policy or policies, including information on whether your organisation has a system to monitor compliance with these policies. If the answer is no, please provide information on what your organisation is doing, or plans to do, to manage modern slavery risks.</p>
3.	<p>Does your organisation have a person or team responsible for overseeing modern slavery risks (including record keeping regarding contractors and subcontractors) that arise in relation to the goods or services that you deliver?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If yes, please describe the role and responsibility of that person/team below.</p>
<b>Training</b>	



4.	<p>Are staff in your organisation trained on how to identify, assess and respond to modern slavery risks?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If yes, please describe the nature of the training available and the positions or roles of staff that receive training. Please also specify whether training is also available to other organisations or staff in your supply chain. If no, does your organisation plan to introduce modern slavery risk training for staff?</p>
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**Supply chain management**

5.	<p>Are you aware of low-skilled migrant workers working in your organisation's supply chains?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If yes, please provide information about where in your organisation's supply chain low-skilled migrant workers are employed.</p>
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6.	<p>Does your organisation or major suppliers operate or have operations in any countries identified as high risk for Modern Slavery, including: Bangladesh, China, Democratic Republic of Congo, Ethiopia, India, Myanmar, Nigeria, Pakistan, Russia, Thailand?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If yes, which countries?</p>
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7.	<p>Does your organisation produce or provide goods/services that are known to have a high Modern Slavery risk factor? For example: agriculture; construction; electronics and electrical products; extractives/mining and basic metal production; fishing and aquaculture; forestry; healthcare; hospitality; housekeeping/facilities operations, textile and apparel manufacturing; transportation and warehousing security; security; cleaning; traffic control.</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If yes, what goods or services does your organisation produce or provides?</p>
8.	<p>Have you had any instances of known or suspected Modern Slavery in your supply chain, or claims or adverse media attention in relation to human rights practices within your supply chain?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If yes, please describe what action your organisation takes.</p>
9.	<p>Does your organisation perform screening or due diligence checks of prospective suppliers to assess the risks of modern slavery or other human rights harms that may occur in its operations and supply chains?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, does your organisation plan to introduce measures to screen prospective suppliers for modern slavery risks in future?</p>
10.	<p>Does your organisation require your suppliers to conduct due diligence for modern slavery risks on their suppliers?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<b>Employment Standards within your organisation</b>	
11.	<p>Are workers required to lodge any 'security deposits' (this could include financial or personal property) or pay any recruitment fees?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>



12.	Are any original identity related documents of workers (e.g. passports, birth certificates, national identity cards) retained?  <input type="checkbox"/> Yes  <input type="checkbox"/> No
13.	Does your organisation deduct wages, impose monetary fines, and/or withhold pay or pay entitlements of workers?  <input type="checkbox"/> Yes  <input type="checkbox"/> No
14.	Are workers paid their legal pay entitlements (including superannuation), on time and provided with pay slips clearly showing how wages have been calculated and details of any tax or other deductions?  <input type="checkbox"/> Yes  <input type="checkbox"/> No
15.	Do you have recruitment policies that ensure child labour is not being used?  <input type="checkbox"/> Yes  <input type="checkbox"/> No
16.	Are all workers provided with a written contract in a language they understand, where terms of employment including wage rates and hours of work are clear?  <input type="checkbox"/> Yes  <input type="checkbox"/> No
17.	Where accommodation is provided to workers (for example, dormitories, hostels or other forms of shared accommodation), are regular checks conducted to ensure that the living conditions are adequate and meet legal requirements (for example, fire safety, space, temperature, lighting, sanitary facilities, privacy, ventilation)?  <input type="checkbox"/> Yes  <input type="checkbox"/> No
18.	Where accommodation is provided, are workers free to leave at will?  <input type="checkbox"/> Yes  <input type="checkbox"/> No



19.	Are workers free to lawfully resign their employment without restriction or penalty?  <input type="checkbox"/> Yes  <input type="checkbox"/> No
20.	Do workers have a complaints mechanism to anonymously raise concerns related to labour conditions or workplace grievances and access appropriate remedy?  <input type="checkbox"/> Yes  <input type="checkbox"/> No
21.	If yes, please describe how these mechanisms are monitored and remedy is provided?  <input type="checkbox"/> Yes  <input type="checkbox"/> No
<b>Response processes</b>	
22.	How would your organisation respond to any allegation of modern slavery or substandard working conditions in its operations or supply chains?
23.	Does your organisation engage in any other due diligence activities to identify, prevent and mitigate risks specific to modern slavery in its operations and supply chains? If so, please describe these activities.  <input type="checkbox"/> Yes  <input type="checkbox"/> No  If yes, please describe these activities below.