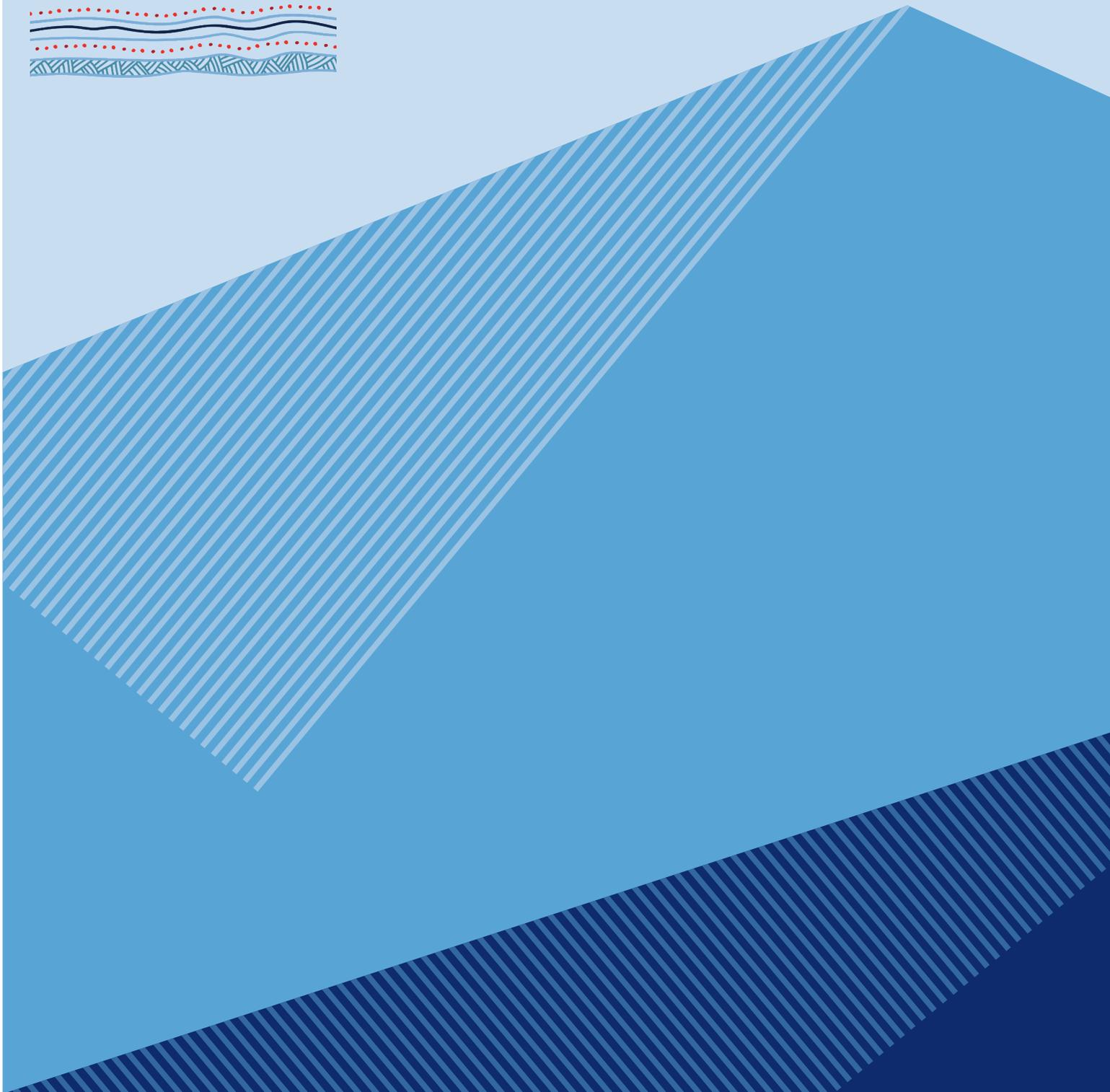
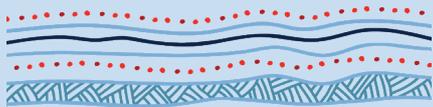


Modern Slavery Statement

Reporting period
1 July 2024
to 30 June 2025

DHA acknowledges the Traditional Owners of the land and communities in which we work. We pay our respects to Elders past, present and future.



Contents

Foreword	4
Overview	5
Executive Summary	5
Mandatory Criteria for Modern Slavery Statements	6
Business and supply chain	7
About DHA	7
Purpose	8
Operations	8
Organisational Governance	9
Risks of Modern Slavery Practices	10
Supply chain	11
Cleaning Services	12
Textiles	12
Construction	12
ICT Hardware	12
Assessing and Addressing Modern Slavery Risks	13
DHA employees' working conditions	15
Labour hire working conditions	15
Safe Working Environment	15
Supply chain	16
Cleaning Services	16
Textiles	16
Construction	16
ICT Hardware	16
Effectiveness	17
2024–25 Performance Review	19
Future Focus	22
2025–26 and beyond priorities and commitments	23
Modern Slavery Workplan	24

Foreword

Defence Housing Australia (DHA) acknowledges that modern slavery is an overarching term encompassing a range of exploitative methods including slavery and slavery-like practices, servitude, forced and bonded labour, human trafficking, and the worst forms of child labour. These abhorrent human rights violations present a complex and far-reaching global problem.

DHA recognises that our business operations are not immune to elements of modern slavery, and we will not turn a blind eye to these risks. We are committed to strengthening our response to modern slavery and continually improving our ability to identify and address risks within our supply chains and operations.

As an Australian Government Business Enterprise, we join the global effort to combat modern slavery by collaborating with the Commonwealth, our partners, and industry experts and to refine our risk profile and map a way forward. We have zero tolerance for any form of modern slavery within our operations and remain diligent in monitoring these risks throughout our business practices and supply chain. DHA continues to develop and implement strategies to enhance our understanding and management of modern slavery risks, both internally and externally.

DHA is proud to report on our ongoing activities in understanding, identifying, and addressing the risk

of modern slavery in our operations and supply chains for the 2024–25 financial year, and have not identified any specific instances of modern slavery harm.

DHA's Statement of Corporate Intent 2025–26 continues our commitment to embedding Environmental, Social and Governance (ESG) considerations into all aspects of our operations, promoting environmental sustainability, fostering social responsibility, and ensuring robust governance practices to meet the expectations of stakeholders and the broader community. ESG extends beyond environmental considerations to encompass areas such as workforce safety, diversity, and accountable supply chains.

DHA remains dedicated to reducing the risk of modern slavery through a commitment to continuous improvement, with a focus on effective policies and procedures, and facilitating transparent and accountable procurement and purchasing activities that exemplify ethical conduct, including not supporting domestic or international

businesses that exploit individuals for profit. Drawing on our learnings over the past six years and following an internal review of DHA's compliance with the *Modern Slavery Act 2018 (Cth)*, we have realigned our commitments to improve the transparency of our high-risk suppliers and continue to enhance how we assess and mitigate modern slavery risks across our organisation. The DHA Board commends this Statement as a testament to our determination to combat modern slavery in all its forms.

In accordance with section 13 of the *Modern Slavery Act 2018 (Cth)*, I am pleased to submit this sixth Modern Slavery Statement for the 2024–25 reporting period on behalf of Defence Housing Australia.

Yours sincerely



Dr Robert Lang
DHA Board Chair

Overview

Executive Summary

This Modern Slavery Statement (Statement) was prepared by the reporting entity Defence Housing Australia ('DHA' or 'the Company') (ABN 72 968 504 934). DHA's principal place of business and registered office is 35 Hinder Street, Gungahlin ACT 2912. As of 30 June 2025, DHA employed 630 staff. There were no other owned or controlled entities during the reporting period.

The *Modern Slavery Act 2018 (Cth)* prescribes a national reporting requirement that applies to entities operating in the Australian market with an annual consolidated revenue of at least \$100 million. Entities are required to report annually on the risks of modern slavery in their operations and supply chains, as well as actions taken to address those risks.

This sixth Modern Slavery Statement outlines the actions taken to address modern slavery throughout DHA's operations and supply chains and affirms DHA's ongoing commitment to reducing the risk of modern slavery through the implementation and continuous review of effective policies and procedures that provide for transparent and accountable procurement and purchasing. DHA is dedicated to sourcing goods and services ethically and does not support domestic or international businesses that exploit individuals for profit.

DHA maintains a continual focus on identified high-risk areas within our supply chain, including Information and Communication Technology (ICT) hardware, construction, cleaning and textiles. Areas requiring further improvement to address emerging and future risks have been identified in the Future Focus section of this Statement.

This Statement has been prepared in accordance with the *Modern Slavery Act 2018 (Cth)* (the Act) and outlines the actions taken by DHA to identify, assess, and address modern slavery risks across our operations and supply chains for the financial year ending 30 June 2025.

This statement was approved by the DHA Board as the Accountable Authority for DHA under the *Public Governance, Performance and Accountability Act 2013 (Cth)* on 5 December 2025.

Mandatory Criteria for Modern Slavery Statements

Criteria	Section within the Statement	Page number
Criteria 1 – Section 16(1)(a) Identify the reporting entity	Overview	5–6
Criteria 2 – Section 16(1)(b) Describe the structure, operations, and supply chains of the reporting entity	Business and Supply Chain	7–9
Criteria 3 – Section 16(1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity	Risk of Modern Slavery Practices	10–12
Criteria 4 – Section 16(1)(d) Describe the actions taken by the reporting entity to assess and address those risks, including due diligence and remediation processes	Assessing and Addressing Modern Slavery	13–16
Criteria 5 – Section 16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions	Effectiveness	17–21
Criteria 6 – Section 16(1)(f) Describe the process of consultation with any entities that the reporting entity owns or controls	About DHA	7
Criteria 7 – Section 16(1)(g) Include any other information that the reporting entity considers relevant	Future Focus	22–26

Business and supply chain

About DHA

DHA is a non-prescribed corporate Commonwealth entity and Government Business Enterprise (GBE), operating under the provisions of the *Defence Housing Australia Act (Cth)* (DHA Act), the *Public Governance, Performance and Accountability Act 2013 (Cth)* (PGPA Act), and the *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule). The DHA Act sets out DHA's functions, powers, corporate structure, and delegations.

The PGPA Act and its associated instruments, policies, and guidance establish the standards of governance, performance and accountability for Commonwealth entities and companies. The PGPA Act also places specific duties on DHA's Board members and officials regarding the use and management of resources.

DHA's staff are employed under the *Public Service Act 1999 (Cth)*. As an Australian Government employer, DHA must comply with the provisions and statutes of various Commonwealth employment related legislation. As a statutory agency, DHA must also operate in accordance with Commonwealth legislation, including (but not limited to) the *Work Health and Safety Act 2011 (Cth)* and the *Modern Slavery Act 2018 (Cth)*.

DHA is the sole reporting entity for the purposes of the DHA Act. There were no additional owned or controlled entities during the reporting period.

Purpose

Defence Housing Australia's purpose is to meet the operational needs of the Australian Defence Force (ADF) and the requirements of the Department of Defence by providing adequate and suitable housing for, and housing related services, to members of the ADF and their families.

Operations

The DHA Act sets out DHA's functions, powers and corporate structure. In accordance with section 5 of the DHA Act, the main function of DHA is to provide adequate and suitable housing for, and housing related services to:

- members of the Defence Force and their families
- officers and employees of the Department of Defence and their families
- persons contracted to provide goods or services to the Defence Force and their families

in order to meet the operational needs of the ADF and the requirements of the Department of Defence.

For more information about DHA operations, please refer to the Statement of Corporate Intent and DHA Annual Report.



Organisational Governance

Shareholder Ministers

The Minister for Defence Personnel, the Hon Matt Keogh MP, has portfolio responsibility for DHA. Under a dual shareholder model, overall responsibility for DHA is exercised jointly by the Minister for Finance, Senator the Hon Katy Gallagher, and the Hon Matt Keogh MP.

Board

A Board of Directors is established in accordance with Part III of the DHA Act and serves as the Accountable Authority for DHA under the PGPA Act. The Board is responsible for ensuring the proper and efficient performance of DHA's functions. The Board makes decisions on organisational direction and strategy, which are outlined in DHA's Corporate Plan and the publicly available Statement of Corporate Intent.

Board and committees

During the reporting period, the Board established four committees to assist in fulfilling its duties. The Board and each committee have a charter that sets out their purpose, composition, and meeting and administrative arrangements. The Board periodically reviews the composition of its committees.

The committees include:

- Board Audit and Risk Committee
- Property and Services Committee
- Nomination and Remuneration Committee
- People and Culture Committee.

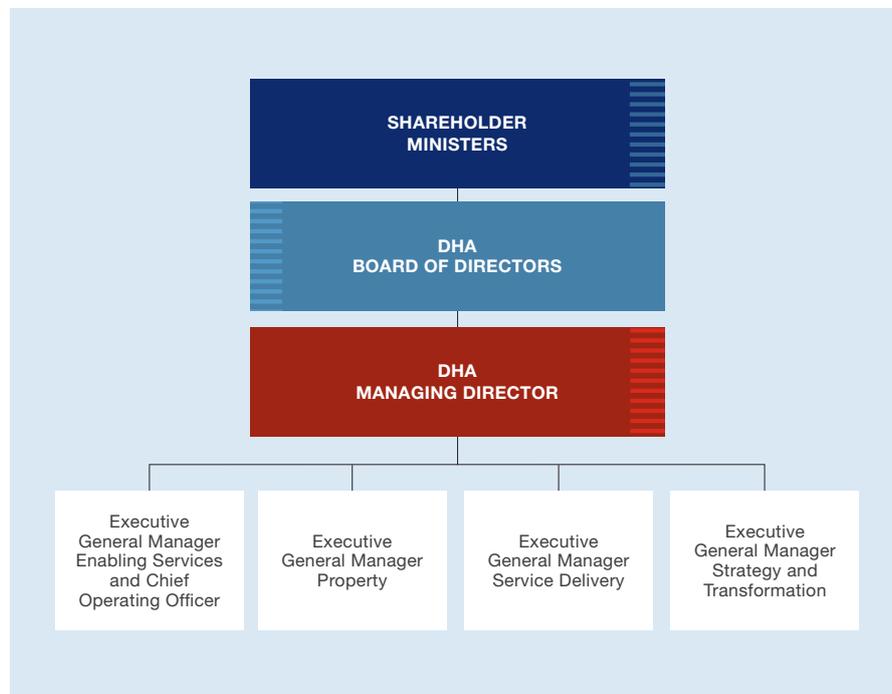
Executive Management

The Managing Director is appointed by the Board in accordance with Part VI (Division 1) of the DHA Act and is the Board's only executive member. The Managing Director oversees strategic direction, organisational structure, staff, performance, and relationships with key stakeholders.

The Executive is accountable for leading, planning, and managing DHA's operations, activities, and performance in achieving DHA's purpose and objectives.

The Managing Director has established an Executive Group and Investment Committee, as well as other executive and national committees as required, to assist in fulfilling their duties. Each committee is governed by a charter or terms of reference that set out its purpose, composition, and meeting arrangements.

Further information on DHA's operations, structure, and governance is available via the DHA Annual Report.



Risks of Modern Slavery Practices

DHA undertook assessments of modern slavery risks in operations and supply chains over the reporting period to consider the risk that DHA might be causing, contributing to, or directly linked to modern slavery practices.

As DHA's primary operations are conducted in an office-based environment located within Australia, it considers there to be a low risk of modern slavery occurring directly within our operations. However, DHA acknowledges that heightened risks of modern slavery remain within our supply chains, particularly in the categories of construction, cleaning, textiles, and ICT Hardware. In 2024–2025, DHA continued to focus our efforts in these areas.

Supply chain

DHA's supply chain encompasses the goods and services required to provide housing and support services to ADF members and their families. DHA purchases these goods and services in accordance with the core principles of the Australian Government's Commonwealth Procurement Rules.

The majority of agreements held with our Tier 1¹ suppliers are Australian-based businesses. These suppliers primarily deliver services rather than physical goods, and their employees are protected under Australia's workplace relations legislation.

IN 2024-25, DHA'S THREE MAIN SUPPLY CHAINS WERE:

1.

trades and other services associated with asset management, valuations, repairs and maintenance (including end of lease and other cleaning services)

2.

construction, upgrade and development services, and

3.

corporate and other contracts, including the provision of information and communications technology goods and services, office cleaning services and corporate uniforms.

In alignment with the Commonwealth, DHA recognises the following industries as presenting a higher risk of modern slavery practices:



CLEANING SERVICES



TEXTILES



CONSTRUCTION



ICT HARDWARE

These industries are where people are most vulnerable to harm through modern slavery practices. By targeting these areas, DHA aims to have the greatest impact in protecting at-risk individuals. Our approach follows the United Nations Guiding Principles on Business and Human Rights, which set the global standard for preventing and addressing human rights issues in business.

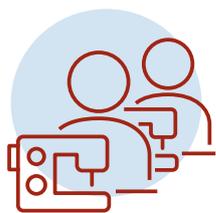
¹ Tier 1 suppliers refer to suppliers where DHA has a direct contractual arrangement.

High risk industries



Cleaning Services

Cleaning services across our commercial offices and property portfolio are considered a high-risk area. This risk arises from several factors, including low pay, poor compliance with workplace laws, reliance on subcontracting and labour hire, unfair contracting practices, a high number of temporary migrant workers, and their limited awareness of worker rights in Australia.



Textiles

To build trust with ADF members, their families, and our suppliers, DHA provides our frontline teams with branded uniforms. The textile industry is widely recognised as high-risk for modern slavery. Across global supply chains, risks include child and forced labour, exploitation of vulnerable workers, excessive working hours, unfair recruitment practices, and unrealistic demands on suppliers, such as tight deadlines and pressure to cut costs.



Construction

To meet the housing needs of the ADF, DHA conducts construction works, upgrades, and repairs and maintenance across our national housing portfolio. These activities are essential to keeping our homes safe, compliant and fit for purpose.

Construction is recognised as a high-risk industry, with these risks stemming from a reliance on low-paid, low-skilled workers, limited visibility of complex supply chains, tight project deadlines, and heavy use of subcontracting. Such practices can lead to the exploitation of vulnerable and migrant workers, many of whom may not fully understand their rights under Australian Law.



ICT Hardware

To support operations, DHA must purchase ICT hardware such as computers, laptops, phones, network infrastructure, and servers. DHA acknowledges that global ICT supply chains are complex and can involve serious risks, including forced overtime, unsafe working conditions, exploitation of women and children, very low wages, and restrictions on workers' freedom of movement

Assessing and Addressing Modern Slavery Risks

DHA continuously reviews its strategic and organisational risks, strengthens oversight of key controls, and implements initiatives aimed at enhancing its risk management practices. DHA's specific approach to addressing the possibility of modern slavery focuses on understanding potential occurrences, maturing management and governance frameworks, and operationalising business processes to identify, mitigate and remediate evolving risks.



THIS APPROACH INCLUDES:

DHA's Risk Management Framework



Environmental, Social and Governance Policy



DHA employees' working conditions



Labour hire working conditions



Work Health and Safety



Training and capability development



Procurement and contract management frameworks



Modern Slavery Grievance and Remediation Procedure



Modern Slavery Performance Review Framework



Annual Modern Slavery Statement Plan



DHA employees' working conditions

All DHA employees are engaged under one of the following agreement types:

- Defence Housing Australia Enterprise Agreement 2024–2027
- A determination made by the Managing Director under section 24.1 of the *Public Service Act 1999 (Cth)*, or
- A common law arrangement.

All of the above agreements meet or exceed the National Employment Standards, mitigating the risk of employees being required to work under unfair conditions.

Labour hire working conditions

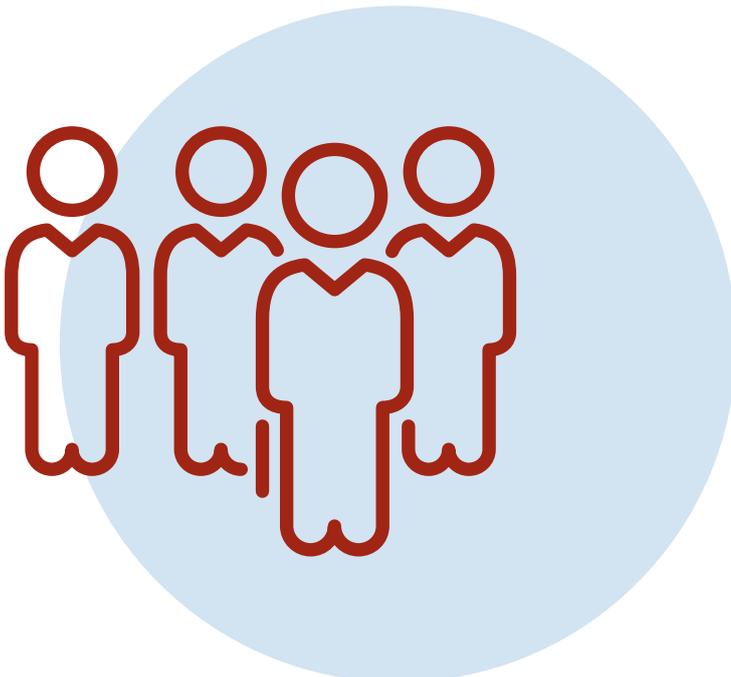
DHA engages most labour hire workers through the Whole of Australian Government People Panel arrangements or via the Digital Transformation Agency's BuyICT marketplaces. All labour hire personnel are engaged under employment contracts that meet the National Employment Standards.

Safe Working Environment

DHA is committed to maintaining a safe and healthy workplace, aligning with ISO45001.

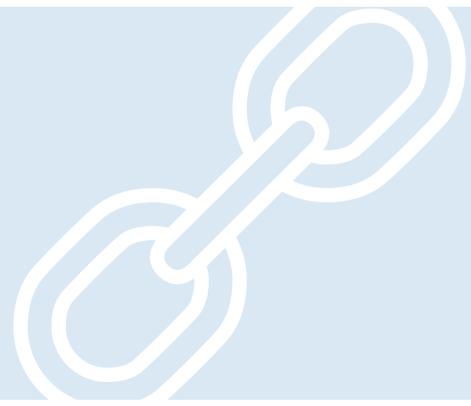
As an Australian GBE, DHA is required to adhere to the *Work Health and Safety Act 2011 (Cth)*. As part of this requirement, DHA must ensure, so far as is reasonably practicable, the health and safety of all workers undertaking work on behalf of DHA, and that the work of DHA employees does not affect the work, health and safety (WHS) of others in the workplace.

DHA contractors are required to comply the state or territory WHS laws in the locality in which they are undertaking work but may also owe a concurrent duty with DHA under Commonwealth WHS laws



Supply chain

DHA's due diligence risk management methodologies enable the following mitigation and response activities in our identified high-risk supply chain industries:



Cleaning Services

To help reduce risk, DHA uses its DHA Modern Slavery Supplier Questionnaire to assess supplier governance and policies during procurement and evaluation. DHA has also strengthened its contracts by embedding the DHA Supplier Code of Conduct and standard modern slavery clauses, setting clear expectations from the beginning of any procurement process and agreement.

In addition, DHA engages certified Indigenous businesses through Supply Nation, which adds another layer of governance to help DHA identify risks early and work collaboratively with suppliers to improve compliance.

To further support staff who manage high-risk contracts, DHA promotes an Australian Government training video (developed in collaboration with the Cleaning Accountability Framework) that explains modern slavery risks in the cleaning industry. This video has been made available on DHA's dedicated modern slavery intranet page.

During 2024–2025 DHA commenced preparations to undertake approaches to the market in 2025–26 in this industry and improved controls through tender documentation, contracts, and due diligence processes. Most Cleaning Services contracts are managed by dedicated residential and commercial asset management teams, ensuring close oversight of these suppliers.

Textiles

In 2022, DHA ran a procurement process for its corporate uniforms. DHA incorporated robust modern slavery checks into the process, requiring suppliers to demonstrate sound governance, ethical practices, and clear obligations for prevention and reporting. DHA selected a company aligned with its values, offering a fully integrated supply chain that provides transparency and traceability, supported by ethical trade audits through Sedex. DHA continues to monitor the contractor's compliance throughout the contract, including reviewing modern slavery risks and controls before considering any extensions. The contract is overseen by a dedicated centralised team.

During 2024–2025, DHA commenced preparations for a new approach to the market in 2025–26, continuing the above controls.

Construction

DHA recognises that complex, multi-tiered supply chains and subcontracting can create exposure to modern slavery risks. While construction and labour in Australia are considered low risk due to strong legal protections, DHA remains vigilant.

During the procurement process, DHA assesses suppliers' governance and corporate structures using the DHA Modern Slavery Supplier Questionnaire and other supplementary tender tools. All contracts include the DHA Supplier Code of Conduct and specific modern slavery clauses, including provision for site audits.

In preparation for significant approaches to market in 2025–26, DHA has undertaken an in-depth review of procurement documents, templates and contract mechanisms for future repairs and maintenance services to strengthen safeguards and ongoing monitoring activities.

In addition to these existing measures – including a Preferred Builders List and Repairs and Maintenance Services panel overseen by a centralised team, as well as high levels of both desktop and onsite contract oversight, DHA continues to map construction suppliers to better understand potential risks and refine mitigation strategies, while exploring more effective ways to manage and monitor risks in this sector.

ICT Hardware

When procuring ICT hardware, DHA uses, where possible, the Australian Government Digital Transformation Agency's (DTA) BuyICT platform. This allows DHA to leverage managed panels and the DTA contracting suite, while also incorporating the use of DHA's Modern Slavery Supplier Questionnaire and adding our DHA Supplier Code of Conduct to agreements.

Working with the BuyICT platform and contracting suite supports DHA in undertaking our own due diligence and continuing to build our capability to identify, mitigate, and manage risk. Utilising the platform also provides DHA with access to educational and supplier engagement activities hosted by the Attorney General's Department (AGD) and the DTA.

Effectiveness

DHA remains vigilant in identifying and implementing actions to improve the management of modern slavery risks, with our supply chains continuing to be our primary focus. In April 2024 DHA, published a Modern Slavery Performance Review Framework (Framework). This statement reflects the first full year of assessment against the Framework, with further enhancements to effectiveness reporting anticipated as technology is upgraded in 2025–26.

Effectiveness

THE EFFECTIVENESS OF INTERNAL CONTROLS IS CONTINUALLY ASSESSED AND WILL BE FURTHER SUPPORTED BY FOLLOWING ACTIVITIES:



Increasing Awareness and Maturity

Promote and communicate knowledge sharing for DHA staff via the DHA Modern Slavery internal webpage, including encouraging engagement with Australian Government training, capability opportunities and resources.

Review and enhance DHA's Procurement and Contract Management Frameworks and templates as insights are gained.



Measuring our success:

The introduction of the Modern Slavery Performance Review Framework in the 2024–25 period detailed DHA's approach to evaluating the effectiveness of its actions to combat and eradicate modern slavery. DHA is committed to undertaking annual performance reviews and reporting the outcomes as part of our Annual Modern Slavery Statements.



Better tools:

Significant work was undertaken during 2024–25 on a new Procure-to-Pay system, which was launched in September 2025. The system has been designed to guide procuring officers through the procurement process, providing questions and guidance to better support the assessment of modern slavery risks across the procurement lifecycle, while also improving visibility of supplier performance and risk.

These enhancements further support the Modern Slavery Performance Review Framework and DHA's efforts in measuring success.



Deeper and more effective screening:

DHA has adopted a new tender management tool for larger procurement projects, particularly those resulting in a DHA managed panel of suppliers in repairs, maintenance and construction services.

This tool supports conditional questions informed by a supplier's responses, enabling the collection of more detailed information relevant to the specific procurement process and industry risks.



Supplier collaboration:

DHA values working with suppliers and will continue to seek opportunities to collaborate on modern slavery initiatives, sharing learnings and working together to eliminate risks.

2024–25 Performance Review

DHA conducts a performance review each year to assess the effectiveness of its strategies and controls for identifying and managing modern slavery risks, in accordance with the DHA Modern Slavery Performance Review Framework.



Areas for improvement have been identified and will form the basis for focus during the 2025–26 reporting period. The findings and overview of achievements from the performance review are detailed below and categorised by area of focus.

FIGURE 5: Modern Slavery Performance Review Framework Key Indicators

Area of focus	Action	Objectives	Achievements
Training and awareness activities	Engage in awareness raising activities on modern slavery risks.	Awareness of modern slavery risks increases among DHA and our suppliers.	<ul style="list-style-type: none"> • Mandatory Modern Slavery Act Awareness e-learning module released and promoted. • Reviewed and updated internal modern slavery webpage including improved guidance on key modern slavery identification and considerations across the procurement lifecycle and links to the AGD’s modern slavery toolkit. • Design and development of the Procure-to-Pay system improves risk assessments at the initiation of all procurements, including embedded links in the system to direct procuring officers to internal modern slavery webpage. • Awareness activities on Modern Slavery risks were embedded into change management activities for the Procure-to-Pay deployment and Procurement Framework uplift.
	Provide guidance materials on identifying and assessing modern slavery risks in DHA procurement.	Understanding of modern slavery risks among DHA officials improves.	
	Review and/or adapt training materials and resources.		
Procurement and contract management processes	Collaborate with other government agencies to identify common suppliers and possible risks across government.	DHA has a better understanding of our supply chains.	<ul style="list-style-type: none"> • Continued participation in the Interdepartmental Committee on Modern Slavery in Public Procurement. • Development of DHA’s Procure-to-Pay system has continued with a focus on risk, improving transparency of Supplier and Contractor Performance Management and controls. Controls include flagging high risk activities, limited consideration of modern slavery to centralised Procurement and Contract Management team along with improved reporting. The system was deployed in September 2025. • Acquisition of tender management tool to manage large scale procurements with a particular focus on DHA managed panels and other higher risk categories. • Greater use of established Australian Government panel arrangements, where suitable.
	Procurement processes are revised to include specific modern slavery risk assessment processes.	DHA suppliers feel supported to identify risks in their supply chains.	
	Contract management processes are revised to include modern slavery risk assessment processes.	Staff report that their understanding and ability to identify high-risk suppliers have improved.	
	Risk management controls are applied to actively manage identified modern slavery risks in new procurement.		

Area of focus	Action	Objectives	Achievements
Supplier activities	Engage with suppliers on modern slavery risks.	Suppliers' transparency regarding their own supply chains and modern slavery risk increases.	<ul style="list-style-type: none"> • DHA Modern Slavery Grievance notification page on DHA's website continues to provide suppliers and other external parties information on DHA's modern slavery activities and an avenue to report perceived modern slavery activities. • Continued use of updated DHA Modern Slavery Supplier Questionnaire during tender processes, DHA Supplier Code of Conduct and Australian Government Commonwealth Contracting Suite standardised modern slavery clauses integrated into Contracts. • Improved Supplier Due Diligence processes particularly in New Build Volume Lease activities and other high-risk categories.
Response activities	Respond to modern slavery risk in DHA procurement activities.	DHA takes steps to actively respond to identified modern slavery practices and risks in our procurement activities.	<ul style="list-style-type: none"> • In conjunction with the development of Procure-to-Pay and the implementation of the tender management tool, DHA has worked to improve spending proposals to ensure risk assessment and mitigation is a focus. • Further controls, reporting and monitoring functionality have been designed within the Procure-to-Pay and tender management tool to support identification of risks, improve visibility of supplier due diligence and performance and improved assurance functionality.

Future Focus

DHA is committed to an ongoing, long-term fight against modern slavery.



2025–26 and beyond priorities and commitments

DHA's plan is to continually improve its tools and training so staff are better equipped to manage these risks across operations and at every stage of the procurement and contract management lifecycle.

DHA'S FOCUS FOR 2025–26 WILL ENCOMPASS THE FOLLOWING ACTIVITIES:



collaborate with DHA's Asset Management and Development and Construction branches to embed mechanisms for identifying and managing modern slavery risks in future procurement activities and contract management processes, with an immediate focus on national repairs and maintenance panels, including cleaning services



finalise and embed revised Procurement and Contract Management Framework, incorporating an improved modern slavery toolkit and refreshed contract mechanisms



implement and embed new Procure-to-Pay and Tender Management tools to uplift procurement and contract management activities, with a focus on risk management. This will be supported by the delivery of high quality, detailed internal guidance documentation, training and ongoing support.



enhancement to procurement and contract management learning materials, ensuring these are updated in line with broader improvements, including requirements and considerations related to modern slavery.



review DHA's Environmental, Social and Governance (ESG) baseline activities to identify new actions or opportunities.

Modern Slavery Workplan

To monitor and advance DHA’s commitments, a Modern Slavery Workplan has been implemented and is updated annually. The Workplan provides a visual overview of commitment activity, which commenced in 2020 and will continue for each reporting period. New actions will be included as they are identified, and status updates recorded for all commitments.

The Workplan provides DHA with a pragmatic approach to strengthening modern slavery risk management and governance processes, building on previous actions that have enhanced DHA’s understanding and capability in managing modern slavery risks within its operations and supply chains.

		Status			
#	Workplan action/commitment	Achieved	Ongoing	In Progress	Future commitments
1	Examine DHA supply chain elements with potential risk.	●			
2	Partner with leading organisations to ensure rapid advancement to maturity in DHA’s approach	●			
3	Obtain additional information from potential suppliers of goods and services to DHA about their modern slavery risks and preventative business practices for consideration in procurement decisions.		●		
4	Review DHA’s procurement and contract management frameworks to ensure better practice is employed when engaging suppliers	●			
5	Introduction to procurement and contract management eLearning modules developed for employees involved in DHA procurement activities with a specific focus on risk management				●
6	Implementation of an online modern slavery training module	●			
7	Further strengthening its procurement and contract management frameworks through the creation of a Modern Slavery toolkit for officials undertaking procurement activities, including a Modern Slavery Risk Screening Tool	●			
8	Full deployment of the Modern Slavery Supplier Questionnaire for future suppliers/service providers to obtain information about their modern slavery risks and preventative business practices for consideration in procurement decisions	●			

#	Workplan action/commitment	Status			
		Achieved	Ongoing	In Progress	Future commitments
9	Development of a Modern Slavery Performance Review Framework to assess the effectiveness of actions taken to address the risk of modern slavery and inform future activities, ensuring DHA is focusing on tangible and sustainable changes	●			
10	Undertaking an annual performance review of DHA's strategies and controls in line with the DHA Modern Slavery Performance Review Framework		●		
11	Strengthening strategies and controls following performance assessments		●		
12	Undertaking in-depth review of key risks specific to DHA construction projects and developing an action plan			●	
13	Monitoring compliance and effectiveness of the Modern Slavery Awareness Act eLearning Module		●		
14	Building controls within the Procure-to-Pay solution (launched in September 2025) to enable better reporting and identification of potential risks	●			
15	Varying existing contracts (if executed prior to the adoption of the standard Modern Slavery contract clauses) that are valued over \$250,000 and considered high risk	●			
16	Engaging with existing high-risk suppliers to undertake the DHA Supplier Modern Slavery Questionnaire if they have not already done so	●			
17	Implementation of a DHA Supplier Code of Conduct into our standard procurement agreements	●			
18	Development and adoption of a Modern Slavery Grievance and Remediation Procedure	●			
19	Refinement and redeployment of the DHA Supplier Modern Slavery Questionnaire	●			
20	Embedding governance procedures and controls to consistently undertake the development of the DHA Annual Modern Slavery Statement, including tracking of commitments and monitoring of actions	●			
21	Full review and revision of the Modern Slavery Act Awareness eLearning modules to update and align with improvements in DHA's processes and better tools, including the procure-to-pay system (launched in September 2025)				●
22	Development of a training package complimenting the modern slavery toolkit to support DHA officials undertaking procurement/contract management, enabling engagement with suppliers to promote uplift of modern slavery risk management				●

#	Workplan action/commitment	Status			
		Achieved	Ongoing	In Progress	Future commitments
23	Development of a modern slavery risk assessment framework for risks specific to DHA construction projects including guidance for conducting assessments, review process and planned mitigation strategies, along with a 'clause bank' for common risks and supported mitigation activities			●	
24	Work with DHA's Strategic Asset Management team to embed modern slavery mechanisms into procurement and contract management documentation and processes for future procurement activities			●	
25	Promote and communicate knowledge sharing actively for DHA staff via the DHA Modern Slavery internal webpage, including encouragement for engagement with Australian Government training and capability opportunities and resources		●		
26	Continue to partner with leading organisations to maintain standards and uplift maturity as the understanding and evolution of modern slavery risk assessments and mitigation standards occur		●		
27	Review and refine DHA Modern Slavery approaches in line with DHA's broader Environmental, Social and Governance approach				●
28	Leverage Procure-to-Pay and tender management tool technology uplift to enhance risk identification, mitigation and assurance activities.				●