



paulramsay
FOUNDATION

MODERN SLAVERY STATEMENT

Under the Modern Slavery Act 2018 (CTH)

REPORTING PERIOD: 01 JULY 2021 – 30 JUNE 2022

Paul Ramsay Foundation Limited
ABN 32 623 132 472

THIS REPORT OUTLINES:

Section 1:

A Snapshot of our Continuing Progress over the Reporting Period

Section 2:

Mandatory Reporting Requirements: General Company Information

Section 3:

Modern Slavery Risks in the Foundation's Operations and Supply Chains

Section 4:

Measuring the Effectiveness of our Modern Slavery Response

Section 5:

Consultation with Owned and Controlled Entities

Section 6:

Key Plans and Initiatives for the Upcoming Reporting Period

Section 7: Appendix

Risk Assessment Methodology Summary

Section 1:

A SNAPSHOT OF OUR CONTINUING PROGRESS OVER THE REPORTING PERIOD

At the outset of our last modern slavery statement lodged under the Modern Slavery Act 2018 (the Act), we declared our intention to work towards becoming a model corporate performer in several key areas.

With this, our third, modern slavery statement, we again believe we have taken key steps consistent with a continuous improvement approach towards achieving that goal.

In particular, we have now aligned our efforts with the following stated intentions and objectives that were described in our last statement:¹

- ✔ Progressing conversations with our Investment Committee and our investment manager in relation to updating our Investment Policy Statement to incorporate principles of responsible investing, with the aim to begin practical implementation in the first half of 2023.
- ✔ Implementing a specific approach to modern slavery issues with grant partners.
- ✔ The inclusion of Modern Slavery Provisions for new supplier contracts.
- ✔ Continued development of our Responsible Sourcing / Ethical Procurement Policy, incorporating modern slavery issues, ensuring that adequate and consistent due diligence is performed prior to onboarding all new suppliers in identified industry categories with potentially elevated risks.
- ✔ Plantation Palms Properties Pty Limited's (an owned/controlled entity) has continued the process of adopting the Foundation's holistic approach to addressing modern slavery issues.
- ✔ Continued to implement, and make procurement decisions based on, active due diligence measures for the selection of solar products in relation to the Foundation's new Head Office redevelopment in Darlinghurst, Sydney.
- ✔ Finalising development and roll out of a reporting / grievance mechanism for external stakeholders to facilitate reporting of concerns relating to potential modern slavery issues; and
- ✔ The ongoing implementation of our measuring effectiveness framework, through continued review of our progress against stated plans in our Second Statement.

This Modern Slavery Statement has been approved by the Board of the Paul Ramsay Foundation Limited on 21 December 2022.



Signature

Michael Traill

Name
Director

21 December 2022

Date

¹ Some of these measures were completed after the expiration of the subject reporting period, but prior to the lodgement of this Statement.

About Paul Ramsay Foundation



Who We Are

The Foundation was established by the late Mr Paul Ramsay AO in 2006. It received a substantial bequest upon his passing in 2014. The Foundation is one of the largest operating foundations in Australia.



Purpose

We believe in a world where all people can lead their best lives. Our purpose is to help end cycles of disadvantage in Australia by enabling equitable opportunity for people and communities to thrive.



Partnership

Our work with partner organisations typically involves working with them to identify particular disadvantages faced by Australians that might be alleviated through a particular course of action then providing funds to that partner to undertake that program, and also assisting with an analysis of the effectiveness of the program.

More information about who we are and what we do can be found at our website at: paulramsayfoundation.org.au



MANDATORY REPORTING REQUIREMENTS: GENERAL COMPANY INFORMATION

The Reporting Entity's Structure, Operations and Supply Chain

The reporting entity under the Act is Paul Ramsay Foundation Limited – ABN 32 623 132 472 ('the Foundation').

The Foundation is an Australian company limited by guarantee. We operate by investing assets that were bequeathed by the late Mr Ramsay (our corpus) to earn income that we use to fund our operations. We do not raise funds from the public. We are headquartered in Sydney and employ approximately 60 employees across our offices in Sydney and Melbourne.

As per previous reporting periods, the Foundation has two (2) owned / controlled companies that are not, individually, mandatory reporting entities:

- Paul Ramsay Holdings Pty Limited
- Plantation Palms Properties Pty Limited - a property development company in far North Queensland.

The operations, supply chains and investment activities are separately differentiated throughout this Statement where such differentiation is contextually appropriate. Otherwise, the described initiatives relating to the Foundation's overall modern slavery response should be taken to include these entities.

Our Supply Chains

To enable the Foundation's core operations, and in continued pursuit of our mission, we remain engaged in contractual relationships with third parties for a wide range of goods and services.

For the reporting period, the Foundation engaged with a total of 290 direct (first-tier) suppliers.

The following is a breakdown of key supply chain features:

Paul Ramsay Foundation Limited - 226 suppliers

Breakdown of supplier location (and nature of international suppliers):

- Australia: 217 suppliers
- USA: 5 suppliers (2 x consulting services, 1 x telecom supplier, 1 x corporate membership and 1x education service)
- New Zealand: 1 supplier (community / philanthropic service)
- Netherlands: 1 supplier (computer /software service)
- UK: 1 supplier (community / philanthropic service)
- Canada: 1 supplier (consulting service)

The Foundation's most significant areas of procurement (by overall spend) for the reporting period were in the industry categories of 'non-residential construction (Australia)' and 'services to finance and investment'.

Other industries categories featured in the Foundation's supply chains for the reporting period include:

- Accommodation
- Advertising services
- Architectural services
- Business services
- Cleaning services
- Computer and technical services / electrical equipment;
- Courier services
- Creative arts
- Community services
- Corporate memberships
- Education services
- Recruitment agencies / employment placement
- Furniture and office equipment
- Catering

Section 2: General Company Information

- Insurance
- Interest groups / community organizations
- Legal services
- Art galleries
- Consulting
- Motion picture suppliers
- Photographer / videographers
- Office suppliers
- Real estate agents
- Event hire
- Waste management
- Security services
- Transport
- Utilities

Paul Ramsay Holdings Pty Limited – 24 suppliers

Breakdown of supplier location (and nature of international suppliers):

- Australia: 22 suppliers
- USA: 1 supplier (legal services)
- UK: 1 supplier (consulting / legal service)

Paul Ramsay Holdings Pty Limited's most significant areas of procurement (by overall spend) for the reporting period were in the industry categories of 'finance and investment' and 'legal services'.

Other industries categories featured in Paul Ramsay Holdings Pty Limited's supply chains for the reporting period include:

- Business management services
- Insurance
- Accounting services
- Non-residential construction
- Removalists
- Architectural services
- Real estate services
- Wholesale trade

Plantation Palms Properties Pty Limited

The supply chain for Plantation Palms Properties Pty Limited (40 direct suppliers) did not change materially during this reporting period. Areas of overall spend, represented industry categories, individual suppliers and overall assessed modern slavery risk have all remained consistent.

Once again, we assessed all new suppliers engaged during this reporting period that had not previously been assessed.

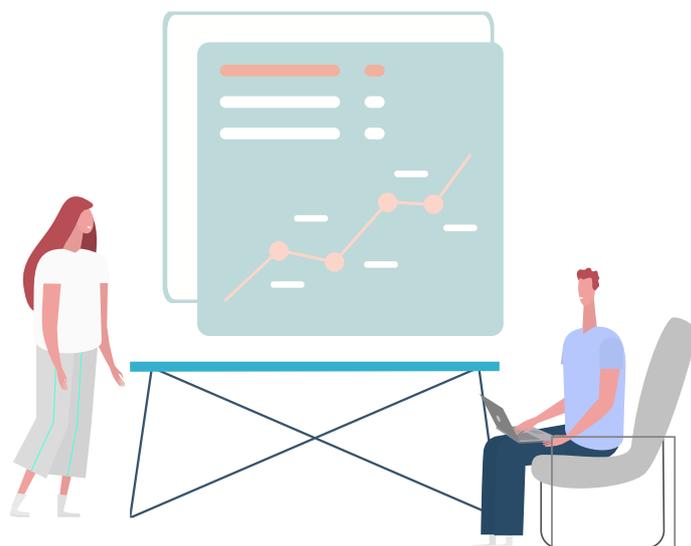
Tracking Supply Chain Changes and Trends Across Reporting Periods

There has been some increase (approximately 50 suppliers) in the overall number of individual suppliers with which the Foundation (and related entities) engaged with over this reporting period compared to previous periods.

Previously unrepresented industry categories with whom the Foundation had supplier engagement during the reporting period include in the areas of "electrical /AV equipment", "office furniture", "interest groups / community organisations", and "art gallery services".

Another area of procurement growth in this reporting period was in relation to the Foundation's use of investment services. Modern slavery risk identification, assessment and response steps in relation to the Foundation's investments (and those of Plantation Palms Properties Pty Limited) are described below.

Overall, there was a significant increase in the Foundation's overall spend on goods and services procured from our direct suppliers. This is primarily attributable to greater expenditure on the key construction/development suppliers in relation to our Head Office redevelopment project (as described in both our previous statements).



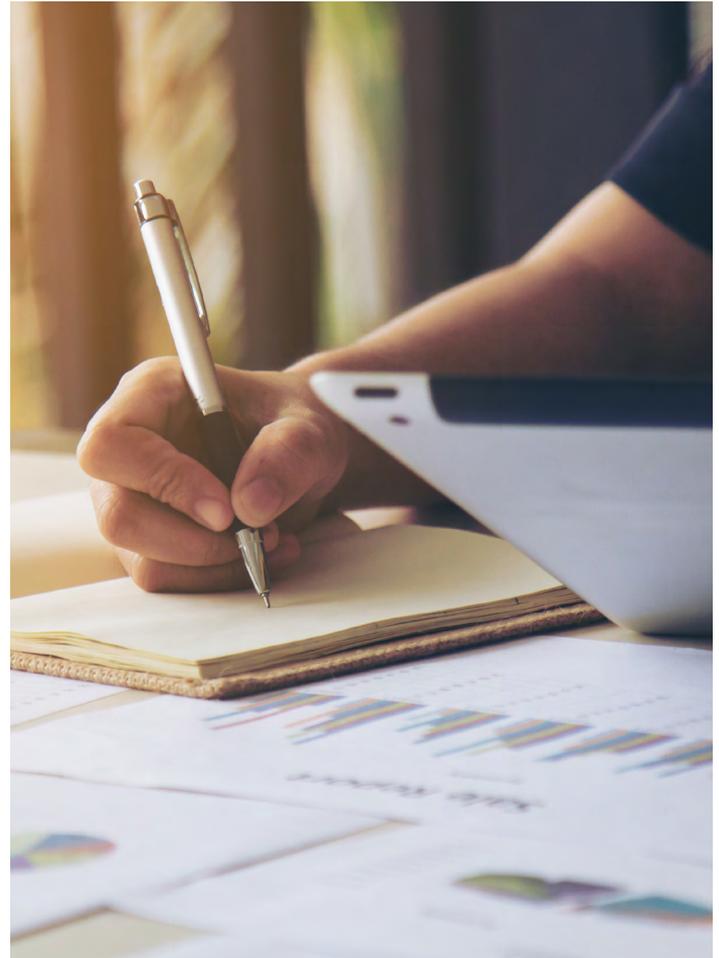
Our Investment Portfolio

In building upon one of our Modern Slavery Working Group's key strategic decisions during the previous reporting period, we have continued to focus on the proportionally greater leverage that we believe can be achieved through ensuring that our investment portfolio is appropriately assessing and addressing modern slavery issues.

This reporting period included some significant investment activity compared to the changes occurring across the previous two reporting periods.

Most notably, the number of individual investee entities almost halved in this reporting period compared to the previous one. Divestiture occurred from a number of US/Israeli investment funds and several Australian externally managed investment funds. There was a corresponding decrease in the Foundation's overall investment spend.

The Foundation's primary investment portfolio has been comprehensively described (including the results of initial risk assessment processes) in previous modern slavery statements.



The following is an overview of the key features of the Foundation's investment portfolio, which continues to be assessed for modern slavery risk.

32

TOTAL INVESTEES

Breakdown of investee location (and nature of international suppliers):

30

INVESTEEES:
AUSTRALIA

2

INVESTEEES:
NEW ZEALAND
(AIRPORT
INFRASTRUCTURE &
MEDICAL EQUIPMENT)

Industry categories featured in the Foundation's Investment Portfolio for the reporting period include:

- Australian Mining / extractives (zinc, copper, lead, fabricated metal products, sheet metal products - 3x investees)
- Road freight / logistics (2x investees)
- Pharmaceuticals
- Investment services/ non-banking finance
- Computer and technical services
- Science equipment
- Retail trade
- Construction
- Real estate
- Tourism
- Employment placement
- Fleet groups

Specific actions to assess and address modern slavery risks relating to the Foundation's investment portfolio are described in Section 3, below.

Section 3:

MODERN SLAVERY RISKS IN THE FOUNDATION'S OPERATIONS AND SUPPLY CHAINS

The Foundation did not receive any reports or other indications of any actual or suspected incidences of modern slavery in our supply chains or operations during the reporting period.

The analysis in relation to potential modern slavery risk areas described in our previous modern slavery statements remains applicable to our operations, supply chains, and investments for this reporting period.

Again, rather than simply repeating much the same information in its entirety, we have concentrated on providing an updated summary of further and ongoing due diligence activities that we have undertaken in endeavouring to continuously improve our modern slavery response.



Supply Chain Risk Assessment

During the reporting period, we have continued the approach, implemented since the inaugural reporting period, of partnering with external consultants to undertake a detailed modern slavery risk assessment of our complete supply chains, including for all controlled entities (as listed above).

Key characteristics of the assessed modern slavery risk in relation to our supply chains remain as follows:



The highest proportional risks are situated at Tier 3 (and beyond) for all entities assessed;



Most elevated and prominent risks are associated with the indispensable reliance on electronic devices/computer hardware inputs in various professional services sectors, which such products have complex global supply chains with numerous potential high-risk areas associated with manufacturing, key componentry and raw materials;² and



Potential risks in relation to non-residential building construction including two main areas, namely:

- domestic (Australian) workforce / industry sector considerations including reliance upon vulnerable/migrant workforce; a sector with low barriers to entry; potential practices such as cash-in-hand payment systems; sham contracting; use of labour hire agencies; pyramid contracting arrangements; and
- commonly used inputs/construction materials that can, at least on a global scale, potentially be high-risk for modern slavery, including concrete, steel, bricks, and renewable energy products (e.g. solar panels).

² Particular geographical areas of concern for global electronics manufacture, include Malaysia and China, which are particularly elevated in terms of risks associated with forced labour. The risks associated with use of conflict minerals in computer and other electronic devices is also significant.

Investment Portfolio Assessment

As with our supply chains, we have continued the approach of partnering with external consultants to undertake ongoing detailed modern slavery risk assessment of our complete investment portfolio.

Modern slavery risks relating to the companies in which the Foundation is directly invested remains, in relative terms, low.

The areas of most elevated potential risk have been assessed as being at tiers 2 and 3. This means that the identified risks primarily exist not for the companies with which the Foundation is invested, but rather at some point of input (including indirect suppliers) into those companies.

These 'input' industries categories with the most elevated relative risk for the investment portfolio include:

- Copper, silver, lead, zinc mining (Australia);
- Services to mining (Australia); and
- Fabricated and sheet metal products

On a global scale, mining and extractive activities of all kinds are recognised as high-risk for modern slavery. Risk factors associated with these extractive type industries include the use of labour hire recruitment agencies; hazardous and remote working locations; the use of low skilled migrant workers. The types of heavy machinery and equipment used in mining operations also have complex global supply chains, reliant upon a web of raw material and products (such as steel, electronic components and rubber) inputs from numerous high-risk regions.

The divestment from overseas investees and decreased overall spend in the Foundation's portfolio, as described above, had the consequential effect of significantly decreasing the assessed modern slavery risk. The results of the updated assessment process also indicate that the of most concentrated areas of residual risk are no longer concentrated at Tier 1.

Operations-related services Assessment

We recognise and continue to monitor areas of domestic modern slavery risk in relation to operational supply chains. In relation to our new headquarters, this includes operational services such as commercial cleaning services and office catering.

The Foundation targeted these kinds of higher risk operational suppliers as part of our early approach to integrating ethical procurement considerations into our due diligence screening of suppliers prior to onboarding.

Overall risk assessment

Overall, the Foundation (and its controlled entities) continues to have modern slavery risk profile that is assessed, in relative terms, to remain low. Our direct supplier engagement remains reflective of our mission and day-to-day operation as a leading Australian philanthropic partnership organisation.

As noted above, from a comparative perspective from previous reporting periods, there have been assessed areas of noted increase and decrease in risk. The former, and perhaps, most significant, relates to the Foundation's investment portfolio. This is particularly positive given the relative commercial leverage and impact that our investment activities have when compared to our expenditure on day-to-day supply chain procurement.

From a supply chain perspective, the greatest source of relative risk continued to be our direct connection with the Australian construction industry through the completion of the construction phase of the Head Office development (moving into the fitout phase), and also with Plantation Palms' operations within the Australian property development sector.



Section 3: Modern Slavery Risks in the Foundation's operations and supply chains

Ongoing Measures During the Reporting Period to Address Risks

✔ Direct Supplier Engagement – Auditing Activities

The engagement of a facilities service provider, who has assumed primary management responsibility for all aspects of the Head Office facility was a significant contractual relationship that the Foundation entered into during the reporting period.

In recognition of this significance, desktop and in-person auditing activities have been undertaken in relation this new Facilities Management Contract.

A modern slavery audit was undertaken in relation to one of our major professional services suppliers. This involved reviewing a range of publicly available information including statements lodged under the Act, published annual reports and a discussion with various executives of the service supplier about the way the risks and initiatives described in that material were dealt with in practice.

✔ Direct Supplier Engagement – Awareness Raising and Collaboration

During the reporting period, the Foundation engaged directly with one of its suppliers (a creative agency) to jointly increase awareness on modern slavery. An outcome from this process was the identification by the supplier of specific hardware products used in their day-to-day operations with a potentially elevated modern slavery risk.

To ensure such collaborative dialogues are, where appropriate, part of an ongoing partnership (rather than a one-off 'checklist'), the Foundation plans to continue this process of supplier engagement.

Specific goals include aiding in the identifying potential lower risk alternatives in relation to the specific hardware products, and/or to confirm that the relevant (indirect) supplier of those products is, in light of the elevated risk, taking adequate steps to mitigate that risk.

✔ Responsible Investment Policy and ongoing engagement with the Foundation's Investment Manager

A major governance development during the reporting period was the Foundation's decision to rewrite its Investment Policy Statement, which expressly addresses modern slavery and other ESG matters.

Over the course of the reporting period, the Foundation has engaged in a collaborative dialogue with our external investment managers to determine the overall approach of a revised Investment Policy Statement. In particular, we have determined that modern slavery risk assessment will be undertaken, as a mandatory pre-investment consideration, for all new potential investments.

We expect to formalise this agreed "pre-investment screening" position through developing and operationalising a revised Investment Policy Statement in the FY23 reporting period.



Section 3: Modern Slavery Risks in the Foundation's operations and supply chains

Ongoing Development of an Ethical Sourcing Policy

The Foundation has undertaken ongoing development of an Ethical Sourcing Policy. Once finalised and rolled out, the Policy will cover a broad range of ESG-issues, including modern slavery, that have been identified as priority areas for the Foundation. We anticipate this policy will be finalised and implemented in the next reporting period.

As detailed above, at Operations-related services Assessment, we have also integrated informal processes to screen select high risk suppliers prior to engagement, in keeping with the broader aims that our Ethical Sourcing Policy (once finalised) will seek to achieve.

As part of our ongoing commitment to responsible procurement practices, during the reporting period the Foundation has utilised our pre-existing modern slavery clauses with new supplier contracts.

We have also started to develop additional clauses with a broader scope to address key ESG issues. We anticipate finalising these ESG focused clauses in the next reporting period.

Assisting the Foundation's Partners with their own modern slavery responses

During the reporting period the Foundation considered how we might appropriately engage with our grant partners about modern slavery issues.

We decided that we will take a supportive and educative approach and that commencing in the FY22/23 period we will:

- Provide tools to new grant partners during the grant development process that assist them to understand modern slavery issues and have discussions about what actions they might take to address any high risk areas they discover in their activities or supply chains; and
- Provide information to our existing grant partners about these modern slavery initiatives in respect of new grants and invite them to consider the issues for themselves.

The Foundation decided that we will we take a different approach to grant partners depending on whether or not they are themselves reporting entities under the Modern Slavery Act 2018 (Cth) and where they are not, our approach will also be informed by their size, sophistication and general ability to prioritise modern slavery awareness in their activities. We also decided that in instances where grant funding is being provided to meet an urgent need (such as flood or bushfire relief) that our discussions about modern slavery issues with those partners will occur after the grant has been made.

We recognise that there is unlikely to be a one size fits all approach to assist grant partners that are not themselves reporting entities to understand their modern slavery risk profile and the potential tools available to address issues.



Section 3: Modern Slavery Risks in the Foundation’s operations and supply chains

Accordingly, we intend to focus during the next reporting period on providing specifically tailored tools to new grant partners.

In advance of providing tools and educational resources to our grant partners in the next reporting period, the Foundation has issued preliminary mailout communication to our grant partners signalling our intentions to collaborate with our grant partners as part of our broader approach to addressing modern slavery.

External complaints policy / grievance mechanism

As foreshadowed in our previous statement, the Foundation has now finalised an External Complaints Policy, which includes a formal grievance mechanism for the reporting of any human-rights-related concerns, including in relation to modern slavery. This grievance mechanism has been developed specifically for the Foundation’s external stakeholders and has been made available on that basis.

Ongoing internal training and educational initiatives on modern slavery issues

The focus for internal training on modern slavery issues during the reporting period was directed at our Investment and Executive Teams.

This emphasis reflects the Foundation’s clear objectives of maximising positive impact to address modern slavery issues through our investment activities and ensuring that our overall modern slavery response is driven by a ‘lead-from-the-top’ mindset.



Section 4:

MEASURING THE EFFECTIVENESS OF OUR MODERN SLAVERY RESPONSE

The Foundation has determined that a cornerstone principle of measuring the effectiveness of its ongoing modern slavery approach is to ensure that we remain closely aligned to, and follow-through with, what we will do for each upcoming reporting period.

Whilst we recognise the importance of remaining flexible and dynamic in response to the changing dynamics that may impact upon our overall modern slavery risk profile, the Foundation believes that it is important to ensure accountability through demonstrated continuity, across reporting periods, between stated plans and actually implemented measures.

To facilitate transparent reporting, a snapshot of our progress against key commitments from our Second Statement are detailed in the table below.



FY22 Commitment	Status Update
Begin discussions with our Investment Committee and our investment manager about approach to responsible investment.	Completed.
Development of a revised Investment Policy Statement in respect of the investment of Foundation's corpus.	In progress, earmarked for finalisation in FY23.
Appoint a Director to participate in our Modern Slavery Working Group, and to assist with broader ESG initiatives.	Not completed. Focus area for FY23 reporting period.
Development of a Responsible Sourcing / Ethical Procurement Policy, to ensure adequate due diligence perform prior to onboarding new suppliers.	In progress, earmarked for finalisation in FY23.
Continue to implement, and make procurement decisions based on, active due diligence measures for the selection of solar products in relation to the Foundation's new Head Office redevelopment in Darlinghurst, Sydney.	Completed.
Plantation Palms Properties Pty Limited (an owned/controlled entity) to fully adopt the Foundation's holistic approach to addressing modern slavery issues.	In progress, earmarked for finalisation in FY23.
Developing a specific approach to modern slavery issues with grant partners.	Completed. Preferred approach to be rolled out in FY23.
Continuing internal consideration of the most appropriate framework regarding how we will measure the effectiveness of our modern slavery actions.	Ongoing.
Modern Slavery Provisions used for new supplier contracts incorporated from 1 July 2021.	Completed.
Roll out of a grievance mechanism for external stakeholders to report modern slavery risk.	Completed.

Section 5:

CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

As per previous reporting periods, the Foundation has two (2) owned / controlled companies that are not mandatory reporting entities:

- Paul Ramsay Holdings Pty Limited
- Plantation Palms Properties Pty Limited (a property development company in far North Queensland)

All of the identified and assessed modern slavery risks, and the ongoing steps that are to be taken to address those risks, also apply to these entities.

Full consultation with these entities has occurred in relation to the preparation and contents of this Statement, and the Foundation's overall response to modern slavery issues.

In particular, Plantation Palms Properties Pty Limited has continued the process of adopting of the Foundation's holistic approach to addressing modern slavery issues. This has included undertaking a comprehensive supply chain risk assessment of all Plantation Palms procurement data for the FY22 reporting period.



Section 6:

KEY PLANS AND INITIATIVES FOR THE UPCOMING REPORTING PERIOD

As we have detailed throughout this statement, the Foundation recognises that there is more work to be done to build on our prior commitments and bring our intended action to fruition.

As part of this recognition, we have set out below a concrete list of our priority areas for the next reporting period:



Appointing a Director to our Modern Slavery Working Group to further ensure that modern slavery priorities at the Foundation are given attention at the highest level, and that there is appropriate alignment between modern slavery issues and broader ESG initiatives.



Finalising the development and implementation of our Responsible Investment Framework, with a specific emphasis on addressing modern slavery issues.



Finalising a Responsible Sourcing / Ethical Procurement policy that addresses modern slavery issues and other ESG issues.



Provision of specifically tailored tools to new grant partners.



Active engagement with the NSW Anti-Slavery Commissioner to assist with implementing strategic roadmaps.



RISK ASSESSMENT METHODOLOGY SUMMARY

As per previous reporting periods, we have continued in our longstanding engagement with external consultants (and utilise their proprietary supply chain analysis software) to carry out comprehensive risk assessment in relation to new suppliers that were onboarded during the subject reporting period. This baseline exercise continues to inform ongoing due diligence focus areas. The following is a brief summary of some key features of its underlying methodology.

Incorporating company spend data throughout global markets, we have utilised external consultants

with proprietary technology to trace the economic inputs required to produce products and services sourced from Tier 1 suppliers to Tier 2 suppliers, Tier 2 suppliers to Tier 3 suppliers, and so on, all the way to Tier 10 suppliers of the supply chain of the Foundation's top suppliers and investments by spend.

This supply chain mapping was performed using a balanced, global Multi-Regional Input-Output (MRIO) table which links supply chain data from 190 countries, and in relation to 15,909 industry sectors.

This MRIO table is assembled using the following sources:



- The United Nations' (UN) System of National Accounts



- UN COMTRADE databases



- Eurostat databases



- The Institute of Developing Economies, Japan External Trade Organisation (IDE/JETRO)



- Numerous National Agencies including the Australian Bureau of Statistics

The MRIO is then examined against the following international standards:

- The UN Guiding Principles for Business and Human Rights
- The Global Slavery Index
- International Labour Organisation (ILO) Global Estimates of Modern Slavery
- The United States' Reports on International Child Labour and Forced Labour

A proprietary algorithm has then been applied to synthesise publicly available risk data against the exclusively licensed MRIO table. The result of this process is the creation of a modern slavery risk profile to Tier 10 for each supplier and investment of the Foundation.

This analysis was performed for the purposes of risk identification under Section 16(1)(c) of the Act. No information confirms the actual existence of non-existence of slavery in the Foundation's supply chains, operations or investments. Analysis was undertaken at the industry and country level. It does not account for variances at the entity, region or product level.

The multi-faceted approach to modern slavery risk assessment that we have undertaken has included examination and analysis of the following:



The individual suppliers, investments and industries with the most elevated risk of modern slavery;



Supply chain and investment plots to provide a visual representation of the supply chain and investment supply chains for the Foundation's top 3 first tier industries;



Plotting the relative slavery risk in the supply chain and investment by tier, up to tier 10;



Geographical depiction of the cumulative risk of modern slavery across the supply chain and investments around the world; and



An overview of the classification of the first tier of our supply chain and investments by country and industry, including relative modern slavery risk.



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MODERN SLAVERY STATEMENT
Under the Modern Slavery Act 2018 (CTH)

Paul Ramsay Foundation Limited
ABN 32 623 132 472