

# Modern Slavery Statement 2021/2022



## Foreword from the Managing Director

It is a pleasure to submit SBS's Modern Slavery Statement for the 2021/22 reporting period.

During this reporting period, the COVID-19 pandemic continued to impact operations and supply chains globally.

SBS is committed to reducing the risk of modern slavery in our operations and supply chains.

This Statement describes the measures SBS has implemented to address the objectives of the Modern Slavery Act. These measures are aimed at identifying modern slavery risks and minimising the risk of modern slavery practices occurring in our operations and supply chains.

We look forward to collaborating with our industry peers and stakeholders to contribute to the eradication of abhorrent modern slavery practices.

This Statement was approved by the SBS Board of Directors in their capacity as principal governing body of SBS at their meeting on 8 November 2022 and is signed by James Taylor in his role as Managing Director of SBS.

**James Taylor**  
Managing Director  
Date: 05/12/2022

## 1. Introduction

The Special Broadcasting Service Corporation (ABN 91 314 398 574) (**SBS**) was founded on the belief that all Australians, regardless of geography, age, cultural background or language skills, should have access to high quality, independent, culturally relevant Australian media. SBS welcomes the opportunity to share SBS's third Modern Slavery Statement in accordance with clause 13 of the *Modern Slavery Act 2018* (Cth) (the **Act**).

For more than 45 years, SBS's commitment to the communities it was established to serve has been central to all that it does. As the multicultural and diverse fabric of Australia continues to evolve, SBS continues to invest in initiatives, inspired by the SBS Charter, to deepen its connections with communities, increase respect and understanding within society as a whole, and in doing so contribute to a cohesive society. These objectives have been more important than ever as our communities navigated the COVID-19 pandemic.

SBS's commitment to addressing modern slavery risks in its operations and supply chain is consistent with the objectives of its Charter. We recognise that our purchasing power can be used to contribute to positive social change in Australia and globally.

As a multicultural and Indigenous broadcaster for all Australians, SBS aims to set a positive example within the community. For many years, through our Reconciliation Action Plans, SBS has demonstrated a commitment to ethical sourcing through Indigenous partnerships. These provide opportunities to promote Aboriginal and Torres Strait Islander cultures, communities and businesses through procurement of goods and services from businesses owned by First Nations people.

In acknowledgment of our commitment to reconciliation and achievements to date, SBS was invited by Reconciliation Australia to participate as an Elevate partner (the highest level within Reconciliation Australia's RAP Framework) in our fifth Reconciliation Action Plan (**RAP**). During National Reconciliation Week 2022, SBS launched its Elevate RAP (2022-2026) accelerating our reconciliation journey through strengthened commitments involving all divisions of SBS. These commitments include growing the Indigenous media sector, and Indigenous businesses more broadly, to provide more opportunities for First Nations people to gain employment and economic participation through targeted actions and key deliverables.

In particular, SBS is committed to maximising procurement from First Nations businesses using Supply Nation, an organisation which facilitates connections between government agencies, corporate Australia and First Nations owned businesses. SBS has been a Supply Nation member since 2011. During the reporting period, SBS continued engaging Supply Nation's First Nations businesses for a variety of services.

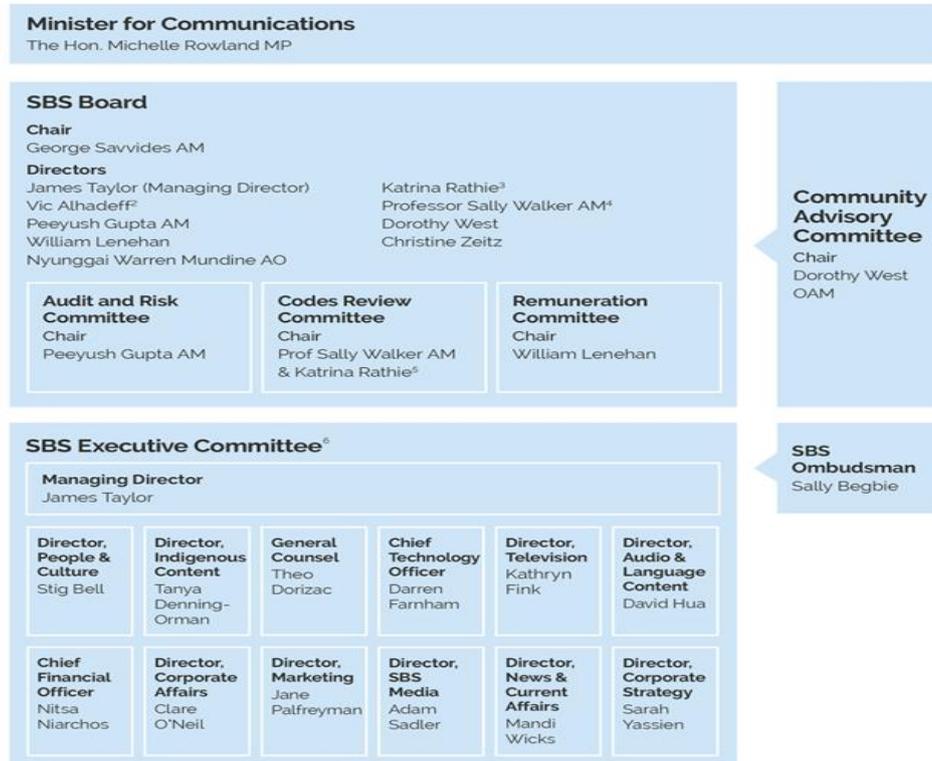
## 2. SBS's structure, operations and supply chains

### Structure

SBS was established as an independent statutory authority on 1 January 1978 under the *Broadcasting Act 1942* (Cth). In 1991 the *Special Broadcasting Service Act (SBS Act)* came into effect and SBS became a corporation. Today, SBS is a Corporate Commonwealth Entity for the purposes of the *Public Governance, Performance and Accountability Act 2013* (Cth) and is governed by the SBS Act.

SBS has a Board of Directors appointed by the Federal Government, which consists of the Managing Director and non-executive Directors. The SBS Board of Directors is responsible for deciding the objectives, strategies, and policies to be followed by SBS in performing its functions. They ensure that SBS performs in a proper, efficient, and economical manner, and with the maximum benefit to the people of Australia. Responsibility for SBS lies within the portfolio of the Minister for Communications, the Honourable Michelle Rowland MP. SBS does not own or control any other entities. Key platforms and channels of SBS include its six free-to-air television channels in SBS, National Indigenous Television (NITV), SBS VICELAND, SBS Food, SBS WorldWatch and SBS World Movies; its streaming service, SBS On Demand; and its SBS Radio services in more than 60 languages, all of which are covered by this Modern Slavery Statement.

### Organisational Structure



<sup>2</sup> Vic Alhadeff was appointed to the SBS Board on 4 October, 2021  
<sup>3</sup> Katrina Rathie was appointed to the SBS Board on 31 March, 2022  
<sup>4</sup> Prof Sally Walker AM concluded her term on the SBS Board on 22 February, 2022  
<sup>5</sup> Katrina Rathie was appointed Chair of the Codes Review Committee on 31 March, 2022  
<sup>6</sup> SBS leadership team as at 4 July, 2022  
<sup>7</sup> Sally Begbie was on leave for part of the reporting period with Amy Stochwell acting in the role.

Figure 1: Organisational structure as at 30 June 2022

## Operations

The principal function of SBS is to provide multilingual and multicultural broadcasting and digital media services that inform, educate, and entertain all Australians, and, in doing so, reflect Australia's multicultural society. SBS carries out its core activities within the media sector. SBS's operations also include ancillary activities which support its core activities and its principal function. An overview of SBS's operations is set out in Figure 3.

As at 30 June 2022, SBS employs 1,728 employees in total and has operations in Sydney, Melbourne Canberra, Brisbane, Perth, Adelaide, Darwin, Hobart, and London. In addition to its employees, SBS engages suppliers to provide a variety of goods and services to SBS as contemplated by the SBS Act (see further under supply chains below).

SBS's focus is delivering services to Australian audiences. SBS's core activities take place in Australia with limited core activities for News and Current Affairs (NACA), Audio and Language Content (ALC) and TV & Online Content taking place overseas.

Further details about the composition of SBS's employment workforce as at 30 June 2022 are as follows:

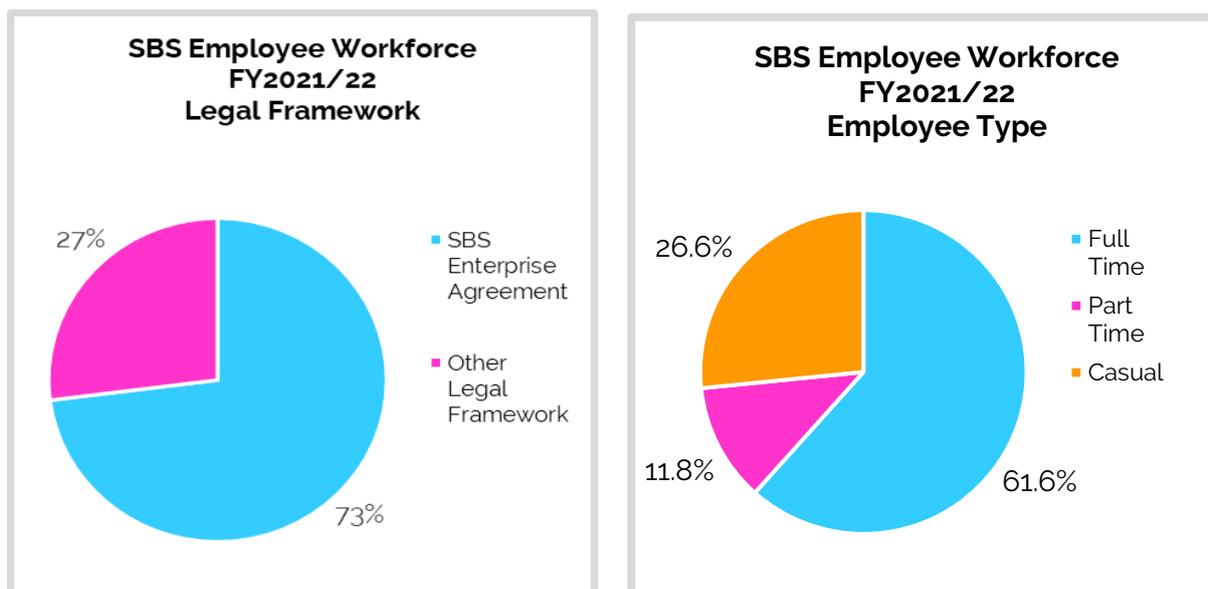


Figure 2. Composition of SBS employee workforce FY2021/22

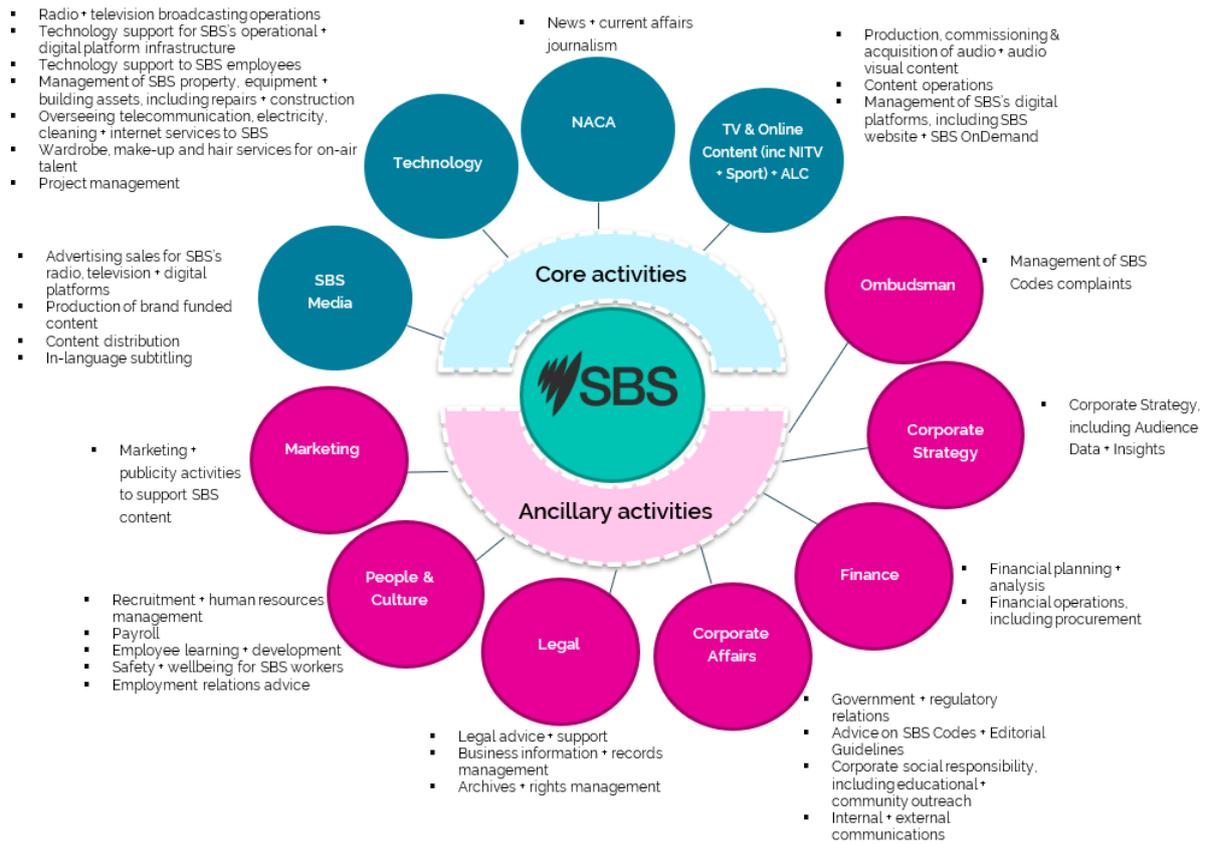


Figure 3. SBS operations FY2021/22

In accordance with the SBS Value, “**we look out for one another**”, SBS’s operations are underpinned by:

- **Robust labour practices** including setting legal compliance and behavioural expectations through employment, labour hire, contractor and other supplier contracts, and appropriate workplace supervision and management;
- **Workplace policies** that prioritise the wellbeing and lawful engagement of all SBS workers (employees and contractors), including the SBS Code of Conduct, Appropriate Workplace Behaviour Policy, the Workplace Health, Safety and Wellbeing Policy and Contractor Management Policy. Training on these policies for SBS employees is compulsory and key elements of these policies are incorporated into the contractor induction that is compulsory for most contractors;
- **Wellbeing initiatives** for SBS employees, which have been enhanced during the COVID-19 pandemic, including access to free counselling services, permission to bring pets into the workplace, health checks and health initiative webinars; and
- **Accessible grievance mechanisms** for SBS employees, including anonymously through SBS’s whistleblowing scheme, YourCall.

## Supply chains

SBS procures a diverse range of goods and services that contribute to SBS’s own products and services, through direct or indirect suppliers. The main types of goods and services procured by SBS are:

Division	Goods and services procured
<b>TV &amp; Online Content (including NITV and Sport), ALC, NACA</b>	Radio and television equipment Pre-production, production and post-production services Commissioned and acquired content On-air talent services Photography Research International stringer services
<b>Technology</b>	Broadcast operations and other major technology and engineering equipment and services Textiles, make-up, hair products Software and software support services Electronic and telecommunications equipment Fittings and furnishings Property, equipment and facilities repairs, maintenance and cleaning services Construction materials and services Telecommunication, electricity and internet services
<b>SBS Media</b>	On-air talent services In-language translation and interpreting services

<b>Marketing</b>	Photography services Design services Editing services Publicity services Media agencies
<b>Finance</b>	Financial management software
<b>People &amp; Culture</b>	External recruitment software and services Learning and development software and services
<b>Legal</b>	External legal advice and support Document management software and services
<b>Cross departmental</b>	Travel, accommodation and transport Office space Insurance Bespoke consultant services Hospitality/catering – food and beverages Stationery SBS-branded merchandise Event planning, management and organisation Learning and development – conferences, courses and events

SBS's suppliers are primarily located in Australia. However:

- Many SBS suppliers source components of their goods or services from overseas. In particular, this includes materials for equipment, software, fittings, furnishings and stationery, ingredients and supplies for hospitality and event planning services, and customer support for telecommunication, electricity, software, internet and insurance services.
- SBS regularly sources acquired audio and audio-visual content, content production services, travel, accommodation, office space and transport from overseas suppliers in the context of SBS's overseas activities and multicultural, multilingual services. For example, ALC has longstanding arrangements with experienced, reputable individual international "stringers" (freelance journalists) all over the world to provide various reporting and production services for ALC's in-language content. A more detailed analysis of the composition of SBS's suppliers is set out in Figure 4 below.

SBS has long term arrangements with reputable suppliers for telecommunication, electricity and internet services, property, equipment and facilities repairs, maintenance and cleaning.

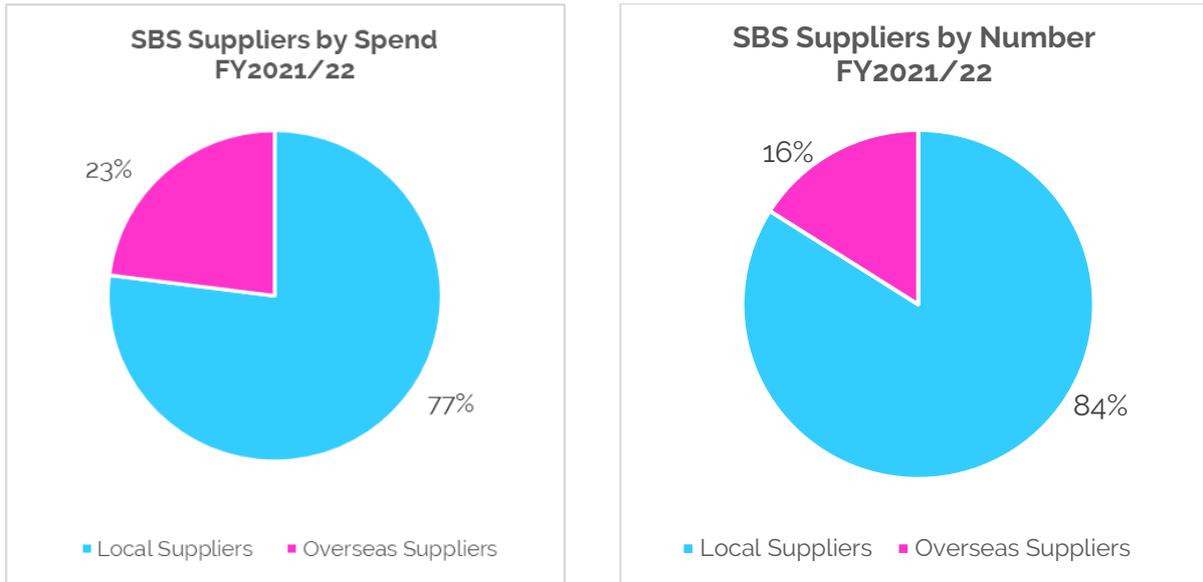


Figure 4: Composition of SBS suppliers FY2021/22

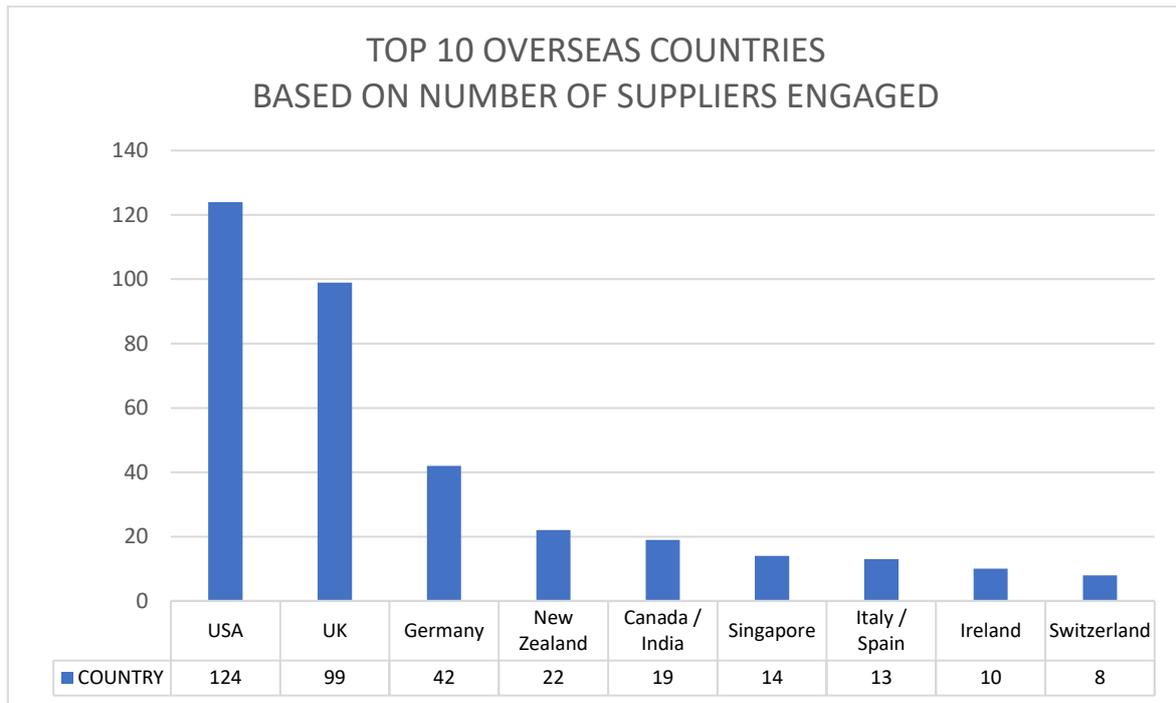


Figure 5: Top 10 overseas countries, based on number of suppliers engaged and location where invoices are issued from/payment sent to, for 2021/22

### Impact of the COVID-19 pandemic on SBS's operations and supply chains

The COVID-19 pandemic impacted SBS's operations and supply chains during the 2021/22 reporting period and the previous reporting periods in a number of ways:

- Reprioritisation of activities:** SBS redesigned and reprioritised some of its core operations to prioritise the safety and wellbeing of its workers and to meet the evolving needs of its audience, within the challenging constraints posed by the pandemic. For example, SBS pivoted to prioritise crucial projects including a COVID-

19 multilingual online portal to help communicate key health information to audiences in more than 60 languages. Technology solutions were also implemented to enable agile working across the organisation and office cleaning services were increased. Production of some programs was postponed while other productions were relocated interstate. Non-essential property projects were postponed and in-person community engagement activities were reduced. These changes had flow-on impacts for our supply chains.

- **Limited events:** With a significant number of SBS workers working from home and limited external events permitted due to public health orders, SBS held very few in-person events, thereby reducing the need to procure hospitality/food and beverage, merchandise and event planning services.
- **Limited travel:** Domestic and international travel restrictions reduced the need to procure travel, accommodation and transport services. Some of SBS's overseas activities continued but with the assistance of additional contractors located in overseas countries instead of local travelling SBS workers.

SBS acknowledges the significant impacts of COVID-19 on operations and supply chains globally and the additional risks it presents to vulnerable workers worldwide. Those impacts have been felt by SBS's suppliers across many industries, including those identified above, and particularly given ongoing economic uncertainties. In an effort to reduce the risk of labour practices being compromised and therefore the impact on vulnerable workers from COVID-19, SBS has:

- **Maintained supplier relationships and fostered open communication with suppliers about COVID-19 impacts**
  - SBS has maintained open communication with suppliers about the impacts of COVID-19. SBS has endeavoured to work with suppliers whose own supply chains and sourcing of materials have been adversely affected by the pandemic, accommodating changes to timeframes for delivery and the availability of products, content or events to minimise risk of detrimental impacts on vulnerable workers.
  - Where feasible, SBS has postponed rather than cancelled financial and contractual commitments with ongoing contractors and other suppliers to provide some assurance regarding future work and ease financial pressure.
  - SBS has also provided periods of payment relief and/or reductions to certain suppliers in good faith recognition of the economic impact on their businesses as a result of the pandemic.
  - Where SBS has required additional services from a supplier as a result of COVID-19, such as cleaning services, SBS has engaged closely with the supplier to ensure that appropriate precautions and protective equipment have been provided to minimise risk of detrimental impacts on the supplier's workers.

### 3. Modern slavery risks

#### What we've done

During the previous reporting periods, SBS carried out a robust three-step scoping and mapping exercise to assess its operations and supply chains. SBS examined whether any of its suppliers or operations **cause, contribute to or are directly linked** to any potential modern slavery risks. SBS has not identified any of its operations or supply chains that cause or contribute to modern slavery risks by being complicit in, facilitating or incentivising modern slavery.

SBS continued this work in the 2021/22 reporting period to examine potential direct links it may have to modern slavery risks, taking a risk-based approach to focus on the following activities set out in Figure 6:

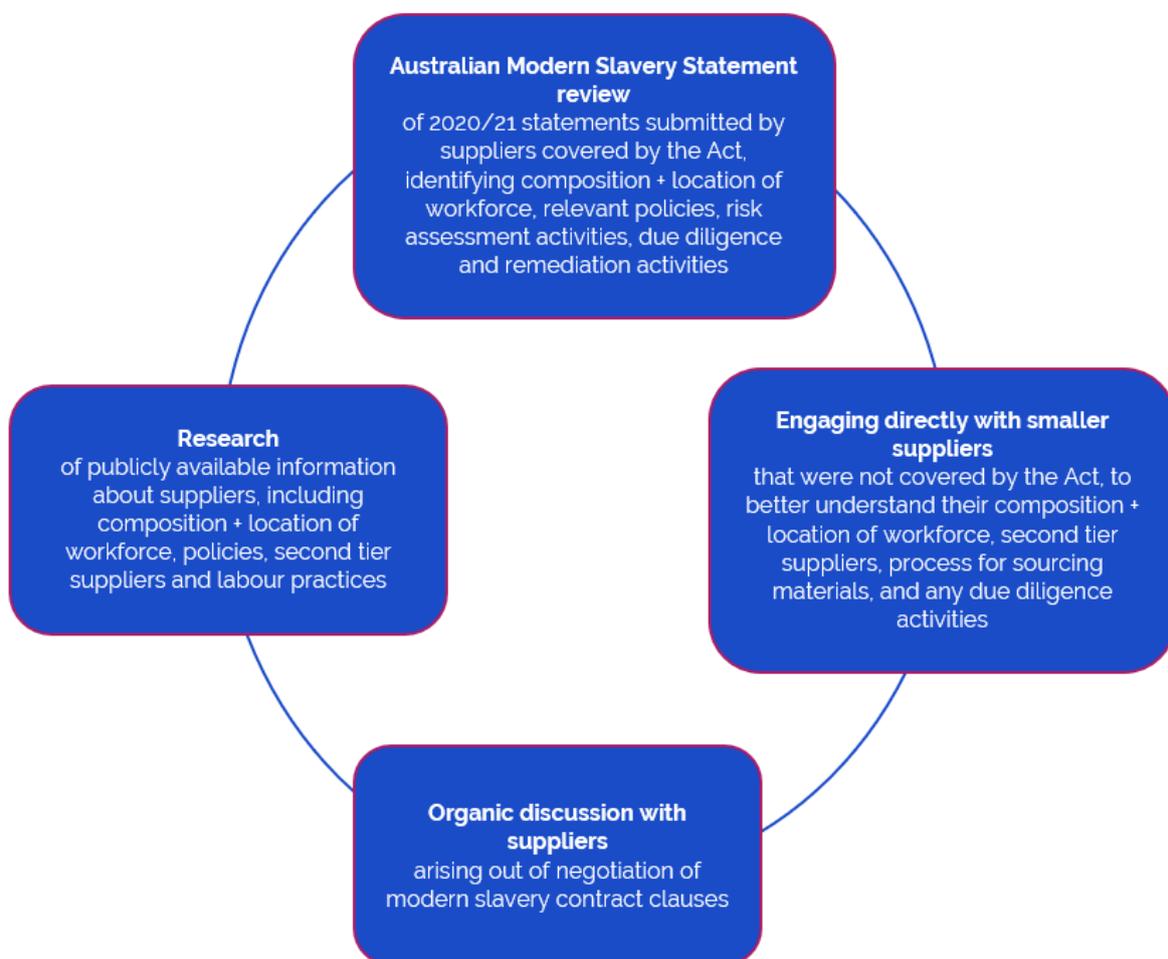


Figure 6. SBS's modern slavery due diligence activities for potential high and medium-high risk suppliers, FY2021/22

#### What we found

As a result of SBS's due diligence activities in the 2021/22 reporting period and previous periods, **SBS considers that any potential modern slavery risks identified among our**

group of suppliers are in most cases being appropriately addressed and mitigated by those suppliers. These suppliers pose a **low actual modern slavery risk** to SBS.

As such, SBS is confident that the **likelihood of it being directly linked to modern slavery risks or practices through its operations or supply chains is low.**

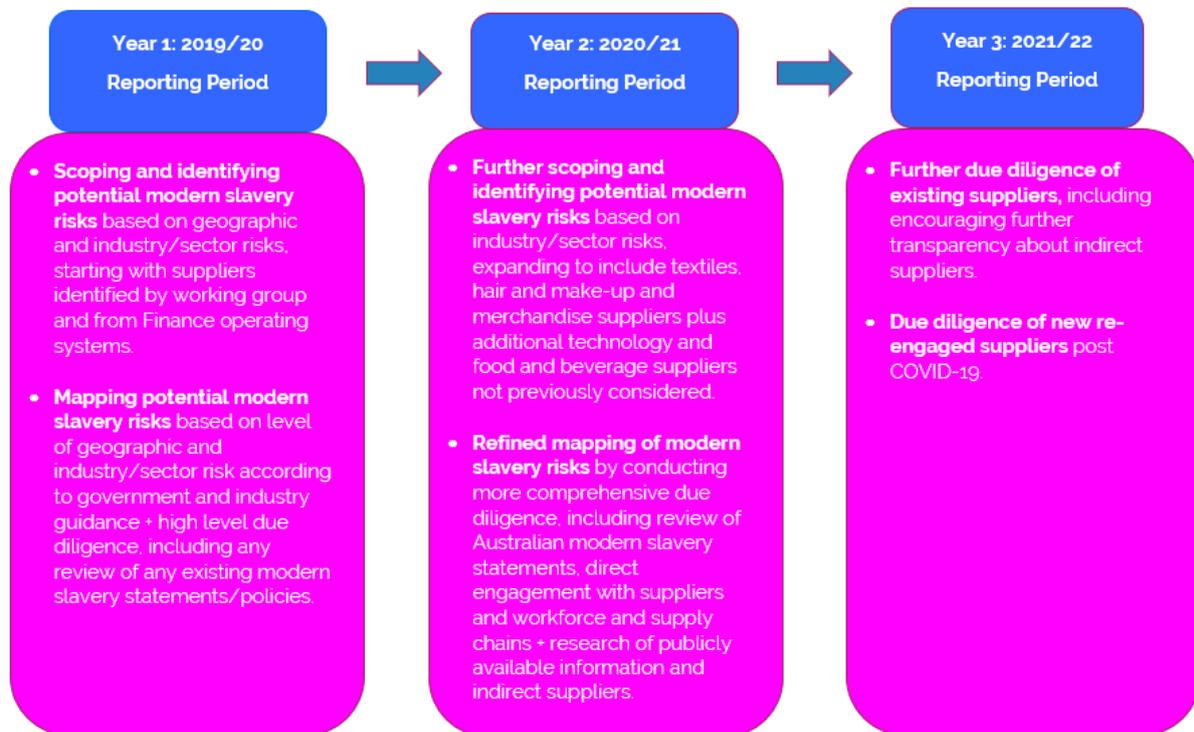


Figure 7: SBS's due diligence activities during the 2021/22 reporting period

#### 4. SBS's response to modern slavery

SBS has continued its previous work in reviewing, assessing and addressing potential modern slavery risks arising from its operations and supply chains during the 2021/22 reporting period. Key activities comprised:

- Further in-depth scoping and assessment of SBS's operations and supply chains and due diligence:** SBS continued its due diligence on previously identified potential high and medium high-risk suppliers. This included review of their Australian modern slavery statements where applicable, plus additional research and direct contact with suppliers. SBS focused more closely on high and medium risk suppliers many who have modest modern slavery policies but are not subject to the Modern Slavery Act. As a result, SBS sent due diligence questions to merchandise suppliers, software technology providers and a café operator. SBS also added modern slavery related questions to the existing questionnaire used in SBS's procurement process.
- Training:** SBS continued delivering an online bespoke modern slavery training module to SBS employees who engage contractors or who are otherwise involved in procuring goods and services for SBS. The purpose of the training is to help staff

to recognise what modern slavery is and why it matters, to identify modern slavery risks in SBS's operations and supply chains, to explain the purpose of SBS's modern slavery contract clauses and to engage in dialogue with suppliers about modern slavery risks. At the end of the 2021-22 reporting period, **100% (200 people) of required staff have successfully completed the module** (which involves correctly answering five questions to test their understanding). The module also directs staff to engage with SBS's modern slavery intranet portal for more information.

- **Modern slavery contractual clauses:** SBS continued to incorporate its tailored modern slavery clauses into new contracts with suppliers and to identify the need for modern slavery clauses in upcoming contracts due for renewal. At a minimum, SBS's modern slavery clauses put suppliers on notice of SBS's obligation to comply with the Act, grant permission to SBS to conduct due diligence and audits and require suppliers to cooperate honestly and in good faith with SBS's due diligence activities. These clauses are included in all applicable SBS contract templates, including contractor agreements and goods and services agreements. SBS has already had valuable discussions with suppliers about modern slavery in the course of contractual negotiations prompted by inclusion of such clauses in SBS contracts. Relevant SBS employees have also been trained and directed to refer new or renewing contracts to Legal to incorporate modern slavery clauses. This approach aims to help ensure that SBS's modern slavery requirements will be reflected in all new or renewed key supplier engagements.
- **Updated Code of Conduct:** SBS reviewed its Code of Conduct for SBS workers which led to the inclusion of a new section on SBS's compliance with the Modern Slavery Act, emphasising the importance to SBS of combatting modern slavery in its operations and supply chains and setting expectations for the role that employees and contractors play in doing so. The new modern slavery section was drafted and finalised during the 2021-22 reporting period, however the SBS Code of Conduct officially launched in August 2022 and further detail on the Code of Conduct and employee and contractor induction rollout will be included in the next reporting period.
- **Modern slavery working group:** SBS continued to facilitate a modern slavery working group comprising representatives from Legal, People & Culture, TV & Online Content, Finance, Technology, Corporate Affairs, ALC, Corporate Services and NACA, led by Legal. This group met on a number of occasions during the reporting period to discuss SBS-wide and Division-based risks and staff engagement, plan and review modern slavery actions and deliverables, and consider industry guidance. A focus of the working group this year was to increase internal learning opportunities and to raise further awareness of the Act and SBS's commitment to reducing modern slavery in our operations and supply chain. Working group members were encouraged to deliver internal training sessions on 'combatting modern slavery' to their own divisions during team meetings. In the current reporting period, the Corporate Affairs representative delivered a session to 21 team members and the People & Culture representative delivered a session to 28 attendees. Further sessions will be delivered during the next reporting period.

- **Raising awareness of modern slavery:** SBS published a modern slavery guidance note on SBS's Producers Hub, a dedicated section of the SBS website for production companies of all sizes working with SBS, to educate and inform producers about modern slavery risks, the Act, what SBS is doing to combat modern slavery, and how production companies can report suspected modern slavery occurrences in SBS's supply chain and operations. The guidance note can be found here – <http://www.sbs.com.au/aboutus/diversity-commissioning/producers-hub-working/>.

During the reporting period, SBS also published an article outlining what modern slavery is and why it is important to SBS on the SBS intranet page accessible by all SBS staff, and also included information in *Inside SBS*, the fortnightly internal email communication from the Managing Director to all staff.

SBS's current affairs program, Dateline, also produced and published on SBS platforms *Missing in China*, an investigation which exposed China's systematic campaign to detain, jail, re-educate and use as forced labour members of the Xinjiang province's second biggest Muslim minority – the ethnic Kazakhs.

- **Collaborating with industry:** Members of the modern slavery working group continued to attend external modern slavery workshops and conferences to enhance SBS's understanding of effective strategies to combat modern slavery and best practice reporting trends.
- **Dedicated modern slavery intranet portal:** SBS continued to update its dedicated modern slavery online portal to provide key resources and information to employees on modern slavery laws and obligations. This portal includes information about modern slavery, relevant modern slavery news and current affairs related content produced by SBS (including about COVID-19 impacts on vulnerable workers, discussed above), links to updated contract templates containing modern slavery clauses, relevant external links to further modern slavery resources, details for internal contacts and links to report allegations of modern slavery to SBS's whistleblowing service.
- **Whistleblowing hotline:** SBS's contracted independent whistleblowing service continues to enable employees to report any allegations of modern slavery in SBS's supply chains safely and securely via an independent whistleblowing platform. Information on the hotline, including contact details, are available on the modern slavery intranet portal.
- **Publication of Modern Slavery Statement:** SBS's Modern Slavery Statements for the 2019/20 and 2020/2021 reporting periods were endorsed by the SBS Board. These have been published on the SBS website and are accessible to the public.

## 5. Effectiveness of actions

The effectiveness of actions already taken to address modern slavery risks is difficult to quantify. However, SBS recognises that a continuous improvement approach necessarily entails mechanisms through which to review, assess and measure the effectiveness of actions taken. Reflecting upon the roadmap which SBS established in its Modern Slavery Statement for the previous reporting periods, SBS has largely been successful in achieving what it set out to do, providing strong foundations to now focus on refining its learnings, implementing best practices and continuing to take further steps to address modern slavery in its operations and supply chains.

SBS undertook the following actions in the 2021/22 reporting period to assess how effective and impactful its actions to date have been:

- Measuring and reporting on the number of employees who completed training on modern slavery as part of their contractor engagement training.** As noted above, **100% of SBS employees whose roles involve engaging contractors or otherwise procuring goods or services for SBS have completed modern slavery training.** The in-built knowledge test, which required 100% correct answers to complete the training, also illustrated a high degree of staff awareness, engagement and understanding of the Act, SBS's modern slavery approach and how to navigate modern slavery issues with suppliers.
- Reviewing direct feedback from suppliers on modern slavery.** SBS observed that its direct engagement with smaller suppliers, either in response to targeted modern slavery due diligence enquiries or as an organic result of contractual negotiation about modern slavery clauses, provided SBS with immediate feedback on suppliers' modern slavery awareness. This gave SBS the opportunity to improve suppliers' understanding of modern slavery. SBS encountered some hesitancy from smaller suppliers and challenges with transparency in supply chains that it will continue to navigate. A summary of the effectiveness of SBS's overall due diligence activities is set out in Figure 8 below.
- Reviewing effectiveness of actions.** As part of its continued improvement approach, SBS's modern slavery working group have considered the effectiveness of SBS's actions on an ongoing basis, including considering the above two actions and learnings from industry collaboration.

Large potential high/medium-high risk suppliers	Smaller potential high/medium-high risk suppliers	Suppliers generally
Large suppliers had mostly submitted robust Modern Slavery Statements during the 2021/22 reporting period, which comprehensively	SBS has encountered some hesitancy in response to its due diligence enquiries among some smaller suppliers that are not	SBS has observed that the introduction of modern slavery clauses into its contracts with a broad suite of suppliers (not only those identified

<p>addressed their modern slavery mitigation practices.</p> <p>For example, SBS's technology suppliers have demonstrated advanced consideration of modern slavery issues, outlining ethical sourcing policies and practices (including through Responsible Business Alliance (RBA) membership and RBA standard supplier codes of conduct), comprehensive RBA-certified audits, remediation activities in the limited cases of adverse audit findings (including requirements for their own suppliers to conduct root cause analysis), transparency in relation to their supply chains and sophisticated risk assessments.</p> <p>A few large suppliers have notable gaps in their Modern Slavery Statements, including limited transparency in their supply chains beyond tier 1 suppliers and limited detail about their actions to address modern slavery. SBS has issued targeted questions to those suppliers for additional information.</p>	<p>covered by the Modern Slavery Act and have had limited prior knowledge of anti-modern slavery legislation practices – for example, local food and beverage suppliers.</p> <p>However, through direct contact with these suppliers SBS has sought to raise awareness of key modern slavery issues, and in doing so has gained better insights into suppliers' operations and supply chains and increased their modern slavery awareness. We have found this approach to be more effective for smaller suppliers than issuing lengthy, standardised supplier due diligence questionnaires.</p> <p>Among some smaller suppliers it is, however, an ongoing challenge to gain visibility of their supply chain as they have provided limited transparency to SBS and there is limited publicly available information.</p>	<p>as high/medium-high risk) during the previous reporting periods has resulted in additional due diligence. Suppliers have raised questions or concerns about the purpose of the clause, which has opened up opportunity for discussion about modern slavery and enabled SBS to gain insights into their current operations and supply chains.</p> <p>For example, commissioned production companies have provided information about the composition and location of their workforce during production and sought to understand more about modern slavery or provided examples of their own modern slavery mitigation practices.</p>
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Figure 8: Summary of overall effectiveness of SBS's modern slavery due diligence activities

## 6. Impact of COVID-19

SBS has outlined earlier in this Statement the impacts of COVID-19 on its operations and supply chains, and the steps it has taken to mitigate the impact of COVID-19 on vulnerable workers.

In terms of impacts of COVID-19 on SBS's modern slavery response during 2021/22 and the previous reporting periods, key impacts included the following:

- **Lack of face-to-face training:** As with most training during 2021/22, SBS pivoted to online modern slavery training for relevant SBS employees rather than face to face training, given most employees were working from home for much of the reporting period. Online training has its limitations, including the missed shared learnings from participant questions in a face-to-face training environment and online training fatigue following a period of other intensive online training.
- **Limited supplier engagement in due diligence:** Less engagement from time and resource-pressed suppliers made conducting due diligence more difficult. As noted above, 2021/22 has been a difficult year for many of SBS's suppliers, with some small businesses in particular necessarily focused on simply keeping their businesses afloat. SBS has taken into account these circumstances and considered the level of modern slavery risk presented by such suppliers in determining the degree of due diligence required at this time.
- **Reduced engagement of certain suppliers:** The impacts of COVID-19 meant that SBS engaged less of its occasional suppliers for hospitality/food and beverage, merchandise, travel, transport and accommodation services in particular. Consequently, SBS did not pursue modern slavery due diligence enquiries with suppliers in such areas unless they had an ongoing relationship with SBS but intends to re-engage with them if or when those services are required again.

## 7. Future roadmap: 2022/23 reporting period

Building on the strong foundations laid during the last three reporting periods, SBS's working group for the 2022/23 period will take a continuous improvement approach to its modern slavery obligations with a focus on:

- incorporating modern slavery as part of SBS's Environmental, Social and Governance (ESG) framework. This framework aims to reduce our impact on the environment and incorporate sustainability in our actions and practices;
- scoping of new suppliers as well as ongoing review and due diligence of existing suppliers to ensure updated supply chain knowledge (including potential identification of indirect suppliers);
- developing frameworks around effective internal and external reporting, to ensure greater compliance and accountability with modern slavery guidelines;

- implementing further training opportunities for all staff to ensure everyone is able to identify and address any risks;
- adopting a process for managing and remediating modern slavery incidents;
- implementing further risk mapping strategies and conducting further assessments of key risk areas, such as geographic risks from overseas suppliers;
- continuing to respond to the ongoing and evolving impacts of COVID-19 on SBS and on the industry, including its large and small business suppliers;
- greater focus on regular engagement and collaboration with industry stakeholders and other parties to share learnings and best practices post 2021/22 reporting period, including identifying further opportunities for partnership and building relationships with business peers, industry bodies and multi-stakeholder bodies;
- continuing to develop and maintain trusted relationships with suppliers to increase transparency and improve supplier awareness of modern slavery risks;
- increasing staff communications on modern slavery and driving staff engagement with the modern slavery intranet portal; and
- developing additional mechanisms and actions to measure effectiveness of SBS's response and implement improvements.