



**Australian Government**

**Civil Aviation Safety Authority**

# Modern Slavery Statement

**Covering the reporting period 1 July 2024 – 30 June 2025**

## **Board endorsement**

This Statement was presented to the CASA Board on 9 October 2025 for approval.

## **Approval**

As the representative of the Civil Aviation Safety Authority, the CASA Board has reviewed the CASA Modern Slavery Statement for the reporting period of 1 July 2024 to 30 June 2025.

As set out in the statement, CASA has responded to and met the mandatory reporting criteria noting the continual improvement approach of the *Modern Slavery Act 2018* (the Act).

**9 October 2025**

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**AIR CHIEF MARSHAL (RET'D) MARK BINSKIN AC**

Chair, Board of the Civil Aviation Safety Authority

# Introduction

## Overview

This document contains the Civil Aviation Safety Authority's (CASA's) fifth annual Modern Slavery Statement (the Statement) for the period 1 July 2024 to 30 June 2025.

## What is Modern Slavery?

The term *modern slavery* describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The Australian Government estimates there are at least 1,500 modern slavery victims in Australia. The United Nations estimates at least 40 million people are forced into modern-day slavery. Australia has agreed with the United Nations to abolish modern slavery by 2030.

Freedom from slavery is a fundamental human right. Under the Australian Government endorsed *United Nations Guiding Principles on Business and Human Rights* (UN Guiding Principles), entities have a responsibility to respect human rights in their operations and supply chains. This responsibility includes taking action to prevent, mitigate and, where appropriate, remedy modern slavery in our operations and supply chains.

## Modern Slavery Act 2018

The *Modern Slavery Act 2018* (the Act) came into force on 1 January 2019, establishing a mandatory reporting regime for entities with consolidated revenue of at least \$100 million, and who are either an Australian entity or a foreign entity undertaking business in Australia.

The Act requires reporting of an annual statement which identifies and addresses the risks of modern slavery in global and domestic operations and supply chains, and actions taken to address those risks.

## Mandatory Requirements

There are seven mandatory criteria to be addressed in this Statement:

1. Identify the reporting entity.
2. Describe the reporting entity's structure, operations and supply chains.
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.
5. Describe how the reporting entity assesses the effectiveness of these actions.
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).
7. Provide any other relevant information.

## Reporting Period 2024–25 and timelines

This Australian Government Modern Slavery Statement covers financial year 2024–25. Statements from entities are due to be published by 31 December 2025.

CASA's Statement must be approved by the CASA Board and signed by a responsible member of the CASA Board prior to publication.

# CASA's Modern Slavery Statement

## Reporting Period 1 July 2024 – 30 June 2025

Criteria	Act Requirement
Threshold	CASA's consolidated revenue for the reporting period was \$195.8 million as reported in the CASA Annual Report 2024-25.
<b>1. Identification</b>	<b>Identify the reporting entity</b>
	<p>CASA is a Corporate Commonwealth Entity, operating under the <i>Public Governance Performance and Accountability Act 2013</i>.</p> <p>CASA was established in 1995 as an independent statutory authority. CASA operates within a legislative framework made up of acts, regulations, associated legislative instruments and guidance material.</p> <p>It is part of the Infrastructure, Transport, Regional Development, Communications, Sport and the Arts Portfolio of the Australian Government.</p>
<b>2. Organisation</b>	<b>Describe the reporting entity's structure, operations and supply chains</b>
<b>A. Structure</b>	<p><b>General Structure</b></p> <p>CASA's organisational structure comprises:</p> <ol style="list-style-type: none"> <li>the CASA Board appointed by the Minister for Infrastructure, Transport, Regional Development and Local Government and consisting of a: <ol style="list-style-type: none"> <li>Chairperson</li> <li>Deputy Chairperson</li> <li>Director of Aviation Safety/Chief Executive Officer</li> <li>Up to four other members,</li> </ol> </li> <li>the Executive team, and</li> <li>seven business areas: <ol style="list-style-type: none"> <li>National Operations &amp; Standards</li> <li>Air Navigation, Transformation &amp; Risk</li> <li>Regulatory Oversight</li> <li>Legal, International and Regulatory Affairs</li> <li>Stakeholder Engagement</li> <li>Corporate Services, and</li> <li>Finance.</li> </ol> </li> </ol> <p><b>Australian Business Number</b></p> <p>ABN 44 808 014 470. CASA does not own or control any other entities.</p> <p><b>Registered office and locations</b></p> <p>Our head office is 18 Marcus Clarke Street, Civic ACT 2601.</p> <p>We also have eight office locations across Australia in Brisbane, Cairns, Sydney, Tamworth, Melbourne, Adelaide, Perth and Darwin.</p>

<b>B. Operations</b>	<p><b>Primary Role</b></p> <p>The key role of CASA is to conduct the safety regulation of civil air operations in Australian territory and the operation of Australian aircraft outside Australian territory. CASA also has responsibility for classifying Australian-administered airspace and determining the services and facilities provided by approved air navigation service providers, having regard to the efficient use of, and equitable access to, Australian-administered airspace.</p> <p>We are responsible for the following safety-related functions under the <i>Civil Aviation Act 1988</i>:</p> <ul style="list-style-type: none"> <li>• encouraging a greater acceptance by the aviation industry of its obligation to maintain high standards of aviation safety, through: <ul style="list-style-type: none"> <li>▪ comprehensive safety education and training programs</li> <li>▪ accurate and timely aviation safety advice</li> </ul> </li> <li>• fostering an awareness in industry of the importance of accepting their safety obligations and, within the community generally, of the importance of aviation safety and compliance with the legislation</li> <li>• promoting full and effective consultation and communication with all interested parties on aviation safety issues.</li> </ul> <p>We perform regulatory functions by:</p> <ul style="list-style-type: none"> <li>• developing and promulgating appropriate, clear and concise aviation safety standards</li> <li>• developing effective enforcement strategies to secure compliance with aviation standards</li> <li>• issuing certificates, licences, registrations and permits</li> <li>• conducting comprehensive aviation safety surveillance</li> <li>• conducting reviews of the system of civil aviation safety to monitor the safety performance of the aviation industry, to identify safety-related trends and risk factors and to promote the development and improvement of the safety system</li> <li>• conducting regular and timely assessments of international safety developments</li> <li>• taking into account the economic and cost impact of the aviation safety standards it sets, the differing risks associated with different industry sectors, and to the extent practicable, the environmental effects of the operation and use of aircraft on the environment.</li> </ul> <p><b>Employees and representatives</b></p> <p>At 30 June 2025, CASA had 863 employees, comprising 845 ongoing employees and 18 non-ongoing employees (including casuals).</p> <p><b>Investments</b></p> <p>We have a diversified investment portfolio across five (5) banking institutions.</p> <p><b>CASA's Stakeholders</b></p> <p>We undertake collaborative engagement with the aviation industry, the Australian Government and wider community to promote and support aviation safety.</p>
<b>C. Supply chain</b>	<b>Types of supply chains</b>

Supply chains consist of goods and services from suppliers and specialists from Australia and internationally, including those with expertise in aviation safety, surveillance and navigation systems, domestic and international operators within the aviation industry, communications and safety education, future air navigation specialists, and corporate supplies such as travel, information technology and property/fit out services.

### **Control of supply chains**

Supply chains are controlled with strict contracting arrangements as defined by the Commonwealth Procurement Rules. Our procurement policy adopts the principles of these rules.

Our suppliers are required to comply with any laws, statutes, regulations, by-laws, ordinances or subordinate legislation in force from time to time, including but not limited to the:

- *Auditor-General Act 1997*
- *Civil Aviation Act 1988*
- *Crimes Act 1914*
- *Criminal Code Act 1995*
- *Disability Discrimination Act 1992*
- *Freedom of Information Act 1982*
- *Environment Protection and Biodiversity Conservation Act 1999*
- *Modern Slavery Act 2018*
- *Privacy Act 1988*
- *Public Governance, Performance and Accountability Act 2013*
- *Public Interest Disclosure Act 2013*
- *Racial Discrimination Act 1975*
- *Safety, Rehabilitation and Compensation Act 1988*
- *Sex Discrimination Act 1984*
- *Trade Practices Act 1974*
- *Workplace Gender Equality Act 2012*
- *Work Health and Safety Act 2011*

### **Disclosures**

Contracts valued at or above \$100,000 (GST Incl.) are published on the CASA website biannually as required under the Murray Motion: [Senate order for entity contracts 1 July 2024 to 30 June 2025 Reporting Period | Civil Aviation Safety Authority](#)

### **Major Suppliers**

Our major suppliers are listed in the table below. These provide long term and value for money supply to enable CASA to achieve its objectives.

<b>Major Service required</b>	<b>Source country</b>
Travel Services	Australia
CASA Regulatory Enterprise Software – European Aviation Processing (EAP) System	Germany
Terminal Instrument Flight Procedures (TIFP) Validation and Revalidation Services	Australia

	Labour Hire for call centre, Information and Communications Technology and other services	Australia
	Examination Facilities, Supervision and Delivery Services	Australia
	Provision of IT equipment and supplies: (Optus, Vocus, Telstra, Epicon IT Solutions, Fujitsu/HP Enterprises, Black Box Technologies Australia, Fortinet, Data#3 Limited, Microsoft)	Australia, Singapore
	Provision of office services and supplies including cleaning	Australia
	Provision of drug wipes	Germany
	Fit out and Construction, Workstations and loose furniture	Australia
<b>3. Risks</b>	<b>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls</b>	
	<p>This reporting period, a risk assessment was conducted for all newly established contracts, where the likelihood and impact of known modern slavery risk factors were considered. The identified contracts and assessments are at Appendix A to this Statement. The risks assessed included:</p> <ul style="list-style-type: none"> <li>• Sector and industry risks – certain sectors and industries may have higher modern slavery risks because of their characteristics, products and processes. An example of this is the use of foreign workers or unskilled labour to carry out functions at night-time or in remote locations.</li> <li>• Product and services risks – certain products and services may have higher modern slavery risks because of the way they are produced, provided or used. Examples include excessive work hours or child labour.</li> <li>• Geographic risks – Some countries may have higher risks of modern slavery due to poor governance, weak law, conflict, migration flows and poverty.</li> <li>• Entity risks – some entities may have modern slavery risks because of poor governance structures, a record of treating workers poorly or a record of human rights violations.</li> </ul> <p>This assessment concluded that the risks of modern slavery in our business activities is <b>LOW</b>. In conducting this assessment, we acknowledge that:</p> <ul style="list-style-type: none"> <li>• Visibility of modern slavery practices in the downstream supply chain is limited.</li> <li>• Modern slavery risks to CASA will change over time as operational requirements change and our understanding of our supply chain improves.</li> <li>• Risks of modern slavery may be heightened in some of our groups supply chains and operations because of the geographical location of some suppliers and the source of materials used in products supplied to us.</li> </ul>	

4. Controls	<b>Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes</b>
	<p>We use a digital procurement solution which requires mandatory consideration of procurement connected policies, including whether the procurement has modern slavery implications. This is a mandatory step for the procuring officer to consider and acknowledge due consideration for any purchase regardless of sector, above \$20,000 (GST Incl.).</p> <p>Additionally, a range of controls exist to ensure, where possible, our suppliers do not increase or contribute to the risk of modern slavery. These include:</p> <ul style="list-style-type: none"> <li>• having standard Australian Government Terms and Conditions incorporating model modern slavery clauses in our procurement documentation and contracts</li> <li>• having specific legislative compliance requirements in our contract terms and conditions</li> <li>• having clauses in contracts to allow contract managers to review/audit any suppliers' arrangement in relation to modern slavery</li> <li>• Use of whole of government purchasing agreements including stationery, travel and fleet leasing</li> <li>• Contract management and monitoring of major contracts.</li> </ul> <p>Where a risk of modern slavery is identified, we will continue to provide education to staff on any potential risks/impacts and possible controls. These may include closer due diligence of suppliers and subcontractors.</p>
5. Evaluation	<b>Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks</b>
	<p>The effectiveness of actions being taken to assess and address modern slavery risks using the CASA risk framework methodology are assessed.</p> <p>Reviews and/or audits of supplier records are possible and can be undertaken regarding performance of obligations under the contract including compliance with legislation and employment arrangements to assess the effectiveness of any stated actions taken to address modern slavery risks.</p> <p>The inclusion of modern slavery considerations in our procurement approval forms, approach to market and contract documentation are reviewed at each stage of the procurement lifecycle to continually review suppliers' obligations for modern slavery.</p> <p>We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon.</p>
6. Consultation	<b>Describe how the reporting entity consulted on its statement with any entities it owns or controls</b>
	CASA does not own or control any other entities and therefore this criterion is not applicable.
7. Relevant Information	<b>Provide information that you think is relevant</b>
	Nil identified



## Appendix A

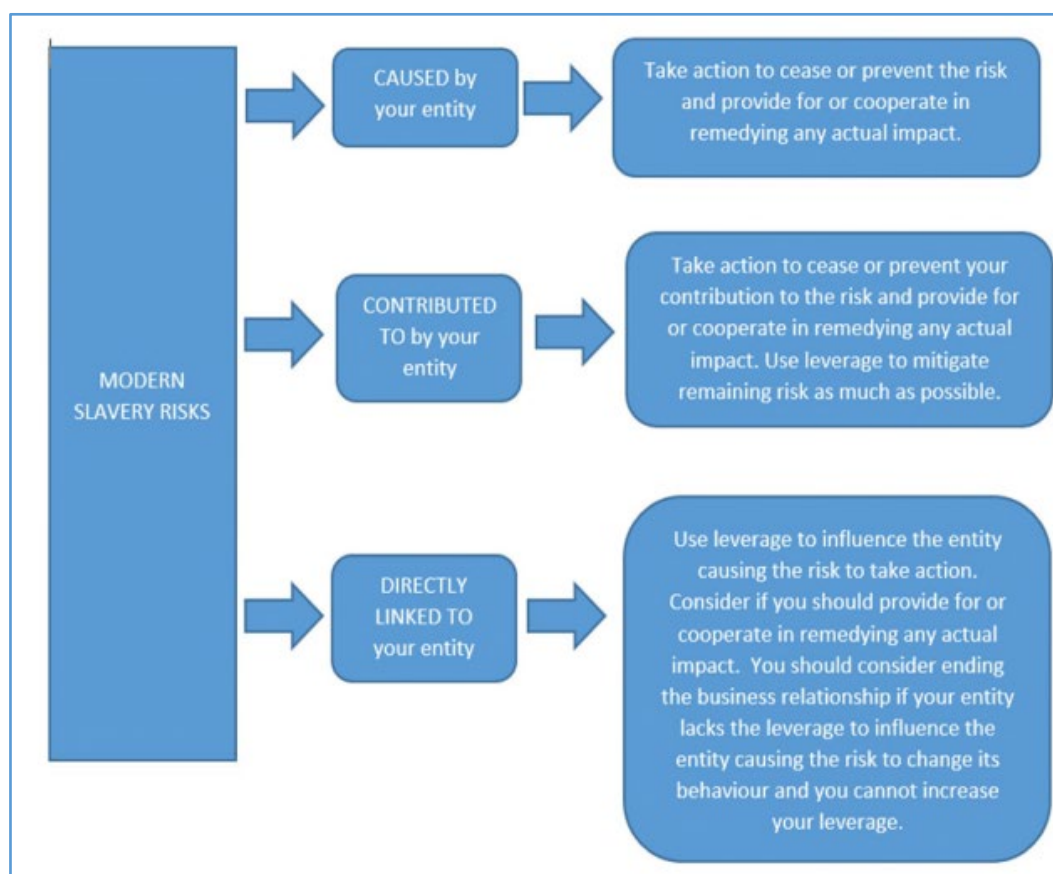
### Risk Assessment

#### Risks of Modern Slavery Practices in CASA Overview

CASA's operations and supply chains cross many industries and sectors. These include travel services, enterprise software, validation services, labour hire, corporate clothing and the provision of IT services and equipment. These industries and sectors have complex multi-tiered downstream supply chains that span various industries and countries.

It is unlikely that CASA's current known and immediate supply chain has risks which meet the threshold for serious exploitation as defined by the Act.

CASA has used the Department of Home Affairs Cause, Contribute and Linked (CCL) Model to limit the risk of modern slavery in our supply chains. This assists us in understanding and focuses on items we directly control or contribute to rather than items where we have less control.



Appendix 1 provides a list of modern slavery indicators used to assist identify the risks with our major suppliers.

We have assessed the indicators and applied the CCL model to develop a risk and control table. In doing so, we acknowledge that:

- visibility of modern slavery practices in the downstream supply chains is limited
- modern slavery risks will change over time as operational requirements change and our understanding of our supply chains improves



- there is a risk that there may be links to modern slavery further down the supply chain that are outside of our control and that are not visible to CASA.

### Generic Controls

CASA has a range of generic controls to ensure that where possible our suppliers do not increase or contribute to the risk of modern slavery. These controls include:

- mandatory considerations of modern slavery for procurement officers in the initiation of any procurement over \$20K
- including standard Australian Government Terms and Conditions encompassing model modern slavery clauses in CASA procurement documentation and contracts
- including specific legislative compliance requirements in our contract terms and conditions
- using whole of government purchasing agreements
- contract management and monitoring of major contracts.

### Future Actions

We will continue to assess any requirement for the inclusion of clauses in approach to market and contract documentation to identify suppliers' obligations for modern slavery and we will include key performance indicators in high-risk contracts on a case-by-case basis.

We will work collaboratively with suppliers (including the use of surveys) to raise awareness of modern slavery risks in their operations and supply chains. We will clearly communicate expectations to suppliers including how to identify, address and report modern slavery issues.

While risks to our business are considered low, we recognise the need to continuously apply due diligence within its operations and supply chains. We will continue to raise awareness by ensuring that processes are followed and training is provided.

### Due Diligence

Where a risk of modern slavery is identified, we will continue to provide education to staff on any potential risks/impacts and possible controls. This may include closer due diligence of suppliers and subcontractors.

We will continue to discuss ongoing areas of concern with our internal legal team to determine any specific areas that should be more closely monitored, including additional clauses in contracts as appropriate.

## Risk and Control table

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4.Controls: Actions taken by CASA to control or address risks
<b>Contribute</b>	<b>Travel Services</b> The Whole of Australian Government (WoAG) Travel Arrangements (the Arrangements) are coordinated procurements established and managed by the Department of Finance (Finance), which involve approximately 140 participating entities and over 20 suppliers.	<p>A <b>low risk</b> is present some suppliers of the Arrangements engage in modern slavery practices. The Suppliers include:</p> <p>Domestic and International Air Travel Services:</p> <ul style="list-style-type: none"> <li>Corporate Travel Management Group Pty Ltd is an Australian founded travel management company (TMC) and is a global provider of innovative and cost-effective travel solutions. Domestic Vehicle Rental Services:</li> <li>Hertz is subsidiary of Hertz Global Holding an American company. It includes the brands Hertz, Dollar Car Rental, Thrifty, Firefly and Donlen. Hertz has a Corporate Social Responsibility report but does not specifically identify Modern Slavery.</li> </ul>	<p>Using of whole of Australian Government travel arrangements, CASA understands the lead agency assesses modern slavery risks. CASA will exercise due diligence in booking travel and car hire suppliers, by assessing whether the contract arrangement allows CASA to review/audit any suppliers' arrangements.</p>
	<b>CASA regulatory Enterprise Software</b>  Supplier: EMPIC GmbH	<p>There is a <b>low risk</b> that CASA's agreements with EMPIC GmbH could be considered as modern slavery. EMPIC-EAP is a software system created by regulators for regulators to address the safety and security oversight responsibilities conferred by International Civil Aviation Organisation and the Chicago Convention.</p>	<p>EMPIC GmbH is German based with approximately 60 employees and has a customer base of 15 other countries.</p> <p>The supplier does not represent a geographic risk in accordance with the indicator table below.</p> <p>This product is used in 15 other countries.</p>

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4.Controls: Actions taken by CASA to control or address risks
			The contract arrangement allows CASA the right to review/audit the supplier's records with regard to performance of obligations under the contract including compliance with legislation and employment arrangements (clause reference 29).
	<b>Terminal Instrument Flight Procedures (TIFP) Validation and Revalidation Services</b>  Supplier: Vee H Aviation	<p>There is a <b>low risk</b> that CASA's agreements with Vee H Aviation could have modern slavery elements for example through employment contracts or third-party maintenance arrangements.</p> <p>Corporate Air holds a domestic and international Air Operator's Certificate and has extensive experience operating throughout Australia, its territories and internationally.</p>	<p>The contract arrangement allows CASA the right to review/audit the supplier's records with regard to performance of obligations under the contract including compliance with legislation and employment arrangements (clause reference C.A.2(a)1).</p> <p>CASA will ensure it is able to review/audit the supplier's employment arrangements when entering into any new agreement with Vee H Aviation.</p>
	<p>DrugWipe devices are manufactured in Germany by Securetec Ag who hold the patents for these products.</p> <p>Supplier: Pathtech</p>	<p>There is a <b>low risk</b> that CASA 's drug wipe devices could be considered as contributing to modern slavery.</p> <p>Securetec the manufacturers of the DrugWipe devices has a certified Quality Management System per ISO 9001:2008 and EN ISO 13485:2012/AC:2012 and is an approved supplier of invitro diagnostic devices.</p> <p>Pathtech are the exclusive Australian and New Zealand distributor for the Securetec product range and are authorised to supply the DrugWipe devices within these regions.</p>	<p>The supplier does not represent a geographic risk in accordance with the indicator table below.</p> <p>The contract arrangement allows CASA the right to review/audit the supplier's records with regard to performance of obligations under the contract including compliance with legislation and employment arrangements (clause reference C.C.22 A).</p>

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4.Controls: Actions taken by CASA to control or address risks
			CASA will ensure it is able to review/audit the supplier's employment arrangements when entering into any new agreement with Pathtech.
	<b>Labour hire for ICT and other services</b>  Supplier: Various	There is a <b>low risk</b> that CASA 's labour hire agreements could be considered as contributing to modern slavery.	CASA will ensure it is able to review/audit any suppliers' employment arrangements when entering into new agreements through labour hire arrangements. CASA's predominant mechanism for labour hire is via established shared procurement arrangements which have generic controls in place to audit employment conditions.
	<b>Examination Facilities, Supervision, and Delivery Services</b>  Supplier: Assessment Services Pty Ltd	There is a <b>low risk</b> that CASA's agreements with Assessment Services Pty Ltd could be considered as modern slavery.	CASA will ensure it is able to review/audit the supplier's employment arrangements when entering into any new agreement with Assessment Services Pty Ltd.
<b>Linked</b>	<b>Provision of IT equipment/software and supplies</b>  Supplier: Various	<p>There is a <b>low risk</b> that the original manufacture of IT equipment may use indentured labour, or labour which is unable to freely leave their position or are in debt bondage.</p> <p>There is a <b>low risk</b> that the original source material to manufacture IT Equipment used indentured labour, or labour which is unable to freely leave their position or are in debt bondage and may include child labour.</p>	<p>The industry which is used to manufacture computer components has a history or indentured labour and servitude which CASA is aware of.</p> <p>CASA uses coordinated procurement arrangements through the Digital Transformation Agency (DTA) in relation to the procurement of IT equipment/software and supplies.</p>

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4.Controls: Actions taken by CASA to control or address risks
	Australian and international distributors using international companies (Optus, Vocus, Telstra, Epicon IT Solutions, Fujitsu/HP Enterprises, Black Box Technologies, Fortinet, Microsoft/Data#3 Limited)		<p>These arrangements ensure more effective processes to deliver better prices, service and quality for the Commonwealth which offer increased transparency, standard terms and conditions.</p> <p>The DTA has implemented several measures within the Hardware Marketplace as well as other ICT panels, arrangements and marketplaces to combat modern slavery.</p> <p>The DTA uses the Modern Slavery Toolkit to assess risks of Modern Slavery, including by considering the sector and industry, products and services, geographic locations, and entity history (e.g. past performance, indicators of modern slavery, etc).</p> <p>DTA evaluates submissions to the marketplace based on a set criterion, which includes the degree to which applicants have appropriate strategies in place to identify and address risks of modern slavery in their supply chain and workforce.</p> <p>CASA has also viewed the Modern Slavery Statements associated with our major IT hardware &amp; software suppliers.</p>

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4.Controls: Actions taken by CASA to control or address risks
	Corporate Clothing Personal Protective Equipment	<p>There is a <b>medium risk</b> that this contract may contribute to modern slavery practices through arrangements with corporate clothing suppliers who may focus on minimising production costs and may use indentured labour, debt bondage or servitude.</p> <p>With appropriate controls, this reduces to a <b>low risk</b>.</p>	CASA will work with suppliers to ensure that PPE and clothing is sourced from socially responsible organisations.
	Provision of office services and supplies <ul style="list-style-type: none"> <li>• Cleaning - ISS</li> <li>• Domestic and international mail – Australia Post</li> <li>• Freight - Toll</li> <li>• Waste Management – Shred X</li> <li>• Vehicle Leasing – SG Fleet</li> </ul>	<p>There is a <b>medium risk</b> that suppliers of cleaning services may engage in modern slavery practices through its recruitment practices or the use of trafficked personnel.</p> <p>With appropriate controls, this reduces to a <b>low risk</b>.</p>	<p>These sector and industry risks and product and services risks are mitigated by CASA contracting processes which include compliance with Australian legislation with employee rights.</p> <p>CASA will exercise increased level of examination of employment conditions, including assessing whether the contract arrangement allows CASA to audit all suppliers' employment arrangements, when entering into new agreements through agencies.</p>

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4.Controls: Actions taken by CASA to control or address risks
	<p>Construction and associated furniture</p> <ul style="list-style-type: none"> <li>• <i>Fit out construction</i> - MPA Construction Group Pty Ltd</li> <li>• <i>Workstations, related office furniture and loose furniture</i> - Zenith Interiors Pty Ltd,</li> <li>• <i>Lockers</i> - Planex</li> </ul>	<p>There is a <b>medium risk</b> that suppliers of these services may engage in modern slavery practices through its recruitment practices or the use of trafficked personnel.</p> <p>With appropriate controls, this reduces to a <b>low risk</b>.</p>	<p>These sector and industry risks and product and services risks are mitigated by CASA contracting processes which include compliance with Australian legislation with employee rights.</p> <p>CASA will exercise increased level of examination of employment conditions, including assessing whether the contract arrangement allows CASA to audit all suppliers' employment arrangements, when entering into new agreements through agencies.</p> <p>Each construction and furniture contract for the Sydney office fit out was with Australian suppliers and materials sourced locally. Each contract has specific requirements around modern slavery.</p>



## Appendix 1: Table of Risk Indicators

Type of Risk	Indicators
<b>Sector and industry risks</b> Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.	<ul style="list-style-type: none"> <li>• Use of unskilled, temporary or seasonal labour.</li> <li>• Use of short-term contracts and outsourcing.</li> <li>• Use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at night-time or in remote locations, such as security or cleaning.</li> <li>• Use of child labour in hazardous conditions, such as underground, with dangerous machinery or tools, in unhealthy environments (including where they are exposed to physical or sexual abuse), or for long hours.</li> <li>• Recruitment strategies by suppliers, their agents or labour hire agencies target specific individuals and groups from marginalised or disadvantaged communities.</li> <li>• The sector involves direct engagement with children, including through orphanage tourism and other forms of 'voluntourism' (including through companies' social investment and corporate social responsibility programs).</li> </ul>
<b>Product and services risks</b> Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.	<ul style="list-style-type: none"> <li>• Cost requirements or delivery timeframes might require suppliers to engage in excessive working hours, make cost savings on labour hire or rapidly increase workforce size.</li> <li>• The development of the product or delivery of the services has been reported as involving labour exploitation by international organisations or non-government organisations (NGOs).</li> <li>• Children are often used in the development of the product or delivery of the service, such as carpet weaving.</li> <li>• The product or components of the product are made in countries where there is a high risk of labour exploitation reported by international organisations or NGOs.</li> </ul>

	<ul style="list-style-type: none"> <li>• The services are provided in countries where there is a high risk of labour exploitation reported by international organisations or NGOs.</li> <li>• The product is made from materials or using services reported to involve a high risk of labour exploitation by international organisations or NGOs.</li> </ul>
<p><b>Geographic risks</b></p> <p>Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty. A number of organisations issue public reports evaluating governance, corruption and rule of law in countries around the world. You can use these reports to identify higher risk countries for modern slavery.</p>	<ul style="list-style-type: none"> <li>• The country has not ratified international conventions relevant to modern slavery, such as: the International Convention to Suppress the Slave Trade and Slavery (1926); ILO Convention (No. 29) concerning Forced or Compulsory Labour (1930); the Supplementary Convention on the Abolition of Slavery, the Slave Trade and Practices similar to Slavery (1956); the Protocol to Suppress, Prevent and Punish Trafficking in Persons, Especially Women and Children (2000); ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (1999).</li> <li>• The country is reported to have a high prevalence of modern slavery or labour rights violations, other human rights violations and/or child labour by international organisations or NGOs.</li> <li>• The country has inadequate protections for workers, including no or weak capacity to effectively monitor workplace standards and enforce compliance with national standards.</li> <li>• Law enforcement agencies are reported to be hostile to workers in at risk industries.</li> <li>• The country forces parts of the population to work for development purposes, for example to assist in construction or agriculture.</li> <li>• The country is reported to have weak rule of law by international organisations or NGOs, including due to corruption, conflict and/or political instability.</li> <li>• The country has a high prevalence of people who are vulnerable to exploitation because they are impoverished, displaced or subject to severe discrimination.</li> </ul>

<p><b>Entity risks</b></p> <p>Some entities may have modern slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.</p>	<ul style="list-style-type: none"> <li>• Entity has previously been reported as noncompliant with human rights or labour standards, including by media or NGO sources.</li> <li>• Entity's procurement and sourcing processes appear poorly managed or inefficient.</li> <li>• Entity has complex or opaque supply chains.</li> <li>• Workers appear to have little information about workplace entitlements and protections and there is a general lack of information about workplace standards.</li> <li>• Audit results for the entity appear unreliable or conflict with other sources of information about the supplier, such as NGO reports.</li> <li>• Staff recruitment costs by labour hire companies or recruiters are not covered by the company, meaning that recruitment expenses such as travel may be improperly imposed on workers.</li> <li>• Entity provides residential care for children overseas.</li> </ul>
<p><b>Indicators of modern slavery</b></p> <p>A combination of these signs may indicate a person is in a situation of modern slavery and that further investigation and assessment is required. You should also consider that some groups may be at higher risk of being impacted by modern slavery, such as women and migrant workers.</p> <p>For example, women can be disproportionately impacted by modern slavery due to structural disadvantages, including lack of access to education.</p>	<ul style="list-style-type: none"> <li>• The suspected victim or victims are: <ul style="list-style-type: none"> <li>▪ living at the workplace, or another place owned/controlled by their employer</li> <li>▪ underpaid or not paid at all</li> <li>▪ required to work excessive hours</li> <li>▪ confined or isolated in the workplace or only leave at odd times</li> <li>▪ guarded at work or in their accommodation</li> <li>▪ isolated in remote locations that are difficult to access and/or restricted from contacting or interacting with people outside the workplace (for example, their phones are confiscated, or they are supervised when in public)</li> <li>▪ managed by an intermediary or third party who 'holds' or 'invests' their money for them</li> <li>▪ subject to different or less favourable working conditions than other workers because of their country of origin, gender or other factors • unable to terminate their employment at any time</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>▪ appear to be servicing a debt to an employer or a third party (such as a recruitment agent)</li> <li>▪ appear to be subjected to, or threatened with, violence, emotional, sexual, verbal or physical abuse and/or degrading treatment in connection with their employment</li> <li>▪ appear to be subjected to intimidation, such as threats to their family or close relations in connection with their employment</li> <li>▪ appear to have false travel or personal documents and/or are not allowed access to these documents because they are being held by an employer or third party</li> <li>▪ appear to have been deceived about the conditions of their employment</li> <li>▪ are not provided with contracts in a language and format that they can easily understand</li> <li>▪ are not informed of, or do not appear able to understand the terms and conditions of their employment</li> <li>▪ are not provided with any protective equipment, training or means to refuse to participate in dangerous work practices, or refuse to handle known toxic materials or hazards</li> <li>▪ do not have permission to work because they are from another country or appear to be working in breach of visa requirements.</li> </ul>
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Information source: Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities

## Appendix 2: References

1. Department of Home Affairs, [Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities](#)
2. [Corporate plan 2024-25 | Civil Aviation Safety Authority](#)
3. CASA [Structure](#) and Organisation Structure
4. [Civil Aviation Act 1988](#)
5. [Public Governance, Performance and Accountability Act 2013](#)
6. [United Nations Guiding Principles on Business and Human Rights](#)
7. [About ICAO](#)