

Modern Slavery Statement





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1. About SAHMRI

South Australian Health and Medical Research Institute Ltd (**SAHMRI**) is a health and medical research institute based in Adelaide, South Australia, committed to inspired research leading to better health for all.

This is the first Modern Slavery Statement we have reported under the *Modern Slavery Act 2018* (Cth) (**the Act**). Our annual consolidated revenue for 2023 unexpectedly exceeded the reporting threshold of \$100 million by a small margin, due to the receipt of several substantial, one-off grants.

We expect that our annual revenue will be below the reporting threshold for 2024, and for the foreseeable future.

2. Our structure

SAHMRI Ltd is the reporting entity and is an Australian not-for-profit company limited by guarantee (ABN 54 141 228 346, ACN 141 228 346). Our registered office is the SAHMRI Building, North Terrace, Adelaide 5000.

We are a charity registered with the Australian Charities and Not-for-Profits Commission (ACNC).

Under our constitution, a Board of Directors is responsible for the corporate governance of SAHMRI.

Our Executive Director, Professor Maria Makrides, leads SAHMRI's Executive Team.

For the reporting period, SAHMRI Ltd owned or controlled the following entities, which are not individually reporting entities under the Act:

- Australian Bragg Centre for Proton Therapy and Research Limited (ABN 12 639 942 804);
- SAHMRI Investments Pty Ltd (ABN 49 164 339 271);
- SAHMRI Foundation Limited as trustee for SAHMRI Trust (ABN 70 609 329 508); and
- Be Well Co Pty Ltd (ABN 85 640 506 896).

For the purposes of this Statement, a reference to 'SAHMRI' or 'we' or 'our' is intended to include these entities, unless specified otherwise.

3. Our operations

The following four research themes guide our research focus:

- Aboriginal Health Equity;
- Lifelong Health;
- Precision Cancer Medicine; and
- Women and Kids.

Within these themes, SAHMRI conducts health and medical research, which is aimed at delivering the right interventions, to the right people, at the right time, is translational and delivers health outcomes with global impact to communities, and provides a focus and leadership for health and medical research.

SAHMRI also conducts commercial operations associated with health and medical research and is an active participant in the Australian Bragg Centre project for proton therapy and research.

Our operations are based at our headquarters in Adelaide, South Australia. We also operate at several other locations within greater Adelaide, including at our Preclinical, Imaging and Research Laboratories (PIRL) facility which is located at Gilles Plains, at the Women's and Children's Hospital and at Flinders



Medical Centre. Whilst our researchers collaborate internationally, all our operations are based in Australia.

Our workforce is Australian based and consists of approximately 503 employees.

4. Our supply chains

Supply Categories

SAHMRI procures a range of products and services to support our activities. Our 2023 spend by category is summarised below.

Supply Category excluding salary costs.	% of spend
Capital Equipment	19%
Business Operations, Professional Services & Office Supplies	9%
Health Services/ Government/ University/ Regulatory	20%
IT equipment/ services & and electronics	9%
Property & Building services	10%
Medical & Laboratory Services & Supplies	25%
Corporate Travel & conferences	2%
Marketing & events	3%
Transport	1%
Equipment maintenance	2%
Total	100%

Geographic Locations

SAHMRI procures products and services from both domestic and international suppliers. The majority of expenditure occurs domestically. Our 2023 spend by location is summarised below.

Top 8 Countries by Spend	Australia	United States	Sweden	France	Slovenia	Canada	Switzerland	United Kingdom
2023 % of relevant spend	77.6%	17.3%	2.0%	1.1%	0.8%	0.4%	0.3%	0.2%

5. Risks of modern slavery

As at the date of approval of this Statement, we have not been made aware of any specific concern relating to modern slavery in our operations or supply chains, nor have we received any whistleblower reports on modern slavery risk.

As noted above, our categorisation as a mandatory reporting entity for 2023 was unexpected. Since the end of the reporting period, we have conducted a gap analysis and have used this to identify what further information we need to perform a modern slavery-specific risk analysis.

6. Actions taken to address modern slavery risk

Whilst we are taking steps to assess and respond to our modern slavery risk moving forward, we do have existing processes in place, including throughout the reporting period, which address modern slavery risks as part of our broader governance framework.

We strive to attain to the highest standards of conduct and ethical behaviour, research integrity and good corporate governance, and to operating:

- Legally and in accordance with applicable legislation and regulations;
- Properly, in accordance with SAHMRI's policy and procedures; and
- Ethically, in accordance with recognised ethical principles.



We have numerous policies and procedures in place to ensure that we act in accordance with our high expectations of conduct. Examples of these include:

- Our Code of Conduct sets out the guidelines that we follow to maintain high ethical and legal standards, appropriate behaviour and accountability across SAHMRI.
- We ensure wherever possible that we have written contracts with our service providers, product suppliers and collaborators, which include obligations to comply with applicable polices, codes of conduct, regulations and legislation, along with reporting responsibilities.
- Our recruitment process and associated policies require thorough screening of new employees, contractors and volunteers, including to ensure their eligibility to work.
- We comply with the Principles, Responsibilities and Definitions of the Australian Code for the Responsible Conduct of Research, and other national guidelines in relation to values and community engagement.
- In relation to health and medical research involving humans, our research projects are also subject to the protections afforded by the human research ethics committee processes.
- We comply with our obligations in relation to whistleblower protection, including by implementing our Whistleblower Policy, which may extend to disclosures relating to modern slavery.

We hold a number of certifications and are subject to audits by external organisations, which include requirements related to responsible sourcing and supply chain management, including:

- ISO 9001 international standard for Quality Management Systems (QMS);
- Good Laboratory Practice (GLP) compliant preclinical services as certified by the National Association of Testing Authorities (NATA);
- Good Manufacturing Practices (GMP) conducted by the SAHMRI in respect of the production and sale of injectable radioisotopes audited by the Therapeutic Goods Administration (TGA);
- Annual audit by the Department of Agriculture, Fisheries and Forestry (DAFF) of SAHMRI's quarantine premises, as well as processes related to imported biologicals used in research and trials;
- Annual audit and checks by SA Health of the SAHMRI School of Anatomy and use of scheduled drugs; and
- Accreditation by the Office of the Gene Technology Regulator (OGTR).

7. Evaluation of actions

As noted above, given this is our first Modern Slavery Statement as a mandatory reporting entity, we are still in the preliminary stages of assessing our modern slavery risk, and developing our response. As part of this response, we intend to evaluate our actions on a regular basis over the coming years.

We note that SAHMRI is a member of the Association of Australian Medical Research Institutes (AAMRI), which is the peak body for medical research institutes across Australia. Through our membership, we have engaged with other medical research institutes to identify how similar organisations are responding to modern slavery risk, to better inform ourselves as to best practice within our industry sector.

8. Consultation process

This Statement was prepared with input from various teams across our organisation, which included members of the Executive Team.



SAHMRI and its controlled entities share common processes, including those related to procurement, along with common members of their Executive Teams, some of whom contributed to this Statement and will be involved on an ongoing basis in our modern slavery response.

9. Other relevant information – next steps

As noted above, assuming the current legislative reporting threshold remains unchanged, it is unlikely that we will remain a mandatory reporting entity in the foreseeable future, including for 2024. However, given our strong commitment to operating legally, ethically and with integrity in all our relationships, we propose to take the following steps to specifically address modern slavery risk:

- Continue to monitor modern slavery risk.
- Continue to engage with the medical research sector to support the ongoing development of our response to modern slavery risk.
- Engage with our suppliers and contractors to ensure they understand our commitment to preventing modern slavery and to enable us to conduct modern slavery-specific assessments as part of our due diligence.
- Review existing SAHMRI policies and processes with a view to amending these, if appropriate, to address modern slavery risk specifically.
- Communicate to staff our commitment to recognise and address modern slavery.

This statement was approved by the SAHMRI Board in its capacity as principal governing body of SAHMRI on 27 June 2024.

The Honourable Hieu Van Le AC Chair of the SAHMRI Board 27 June 2024