

MODERN SLAVERY STATEMENT



1. Introduction

This statement, made pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) (**the Act**), is made on behalf of Scope (Aust) Ltd, and its wholly owned subsidiary, Home@Scope Pty Ltd (together referred to as **Scope**, we, us or our).

Scope is committed to supporting and advancing human rights in all aspects of our work, and to compliance with the Act.

Scope acknowledges that slavery can occur in many forms as detailed in the Act including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting.

The purpose of this statement is to outline our approach to ensuring that Scope has processes in place to minimise the risks of modern slavery in our business operations and supply chains.

2. About Scope: Our Structure and Operations

Scope is a disability service provider. We support the needs of people with physical, intellectual and multiple disabilities and their families. Scope's mission is to "enable each person we support to live as an empowered and equal citizen."

Scope aims to inspire and lead change to deliver best practice through the following means:

- Support and listen to each person and their family;
- Provide leadership to influence strategy and public policy;
- Deliver person driven, flexible and responsive services to build a sustainable future;
- Build on our foundation for success through our expertise in service delivery, workforce development, quality improvement and research.

Scope provides support services to more than 4,870 customers across 335 locations and employment to 4,400 people.

A copy of Scope's organisational structure is found at **Annexure A**.

Our supply chains and primary procurement functions are comprised of:

- Implementation and governance of internal practices in relation to receiving goods and services and management of procurement data. These transactions are governed by Procurement and Contract Management Policies and associated processes.
- Vendor engagement and management including onboarding, tenders, compliance, and renegotiations.
- Alignment with and in support of Scope's strategy and corporate aims which guide overall procurement activity.

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- Our supply chain generally falls into three categories – local, independent goods and service providers, multinational professional services firms or large locally run distributors and retailers. The bulk of Scope spend is on services provided by local vendors or global organisations that have very clear corporate responsibility policies in place that address their business practices in detail to combat modern slavery risks. Most of the goods Scope procure such as office and home consumables and IT hardware/software are generally sourced via reputable retailers who also adhere to robust corporate responsibility policies

3. Risk Identification

Scope Procurement have undertaken the following activity to identify slavery risks within Scope's supply chains.

- Clean up of vendor database to remove inactive or lapsed suppliers and classify existing suppliers for analysis – reduced from 6000 to roughly 2000 vendors with active ABNs (Completed March 2020)
- Given the size of vendor database and work required to assess risks of each vendor, this project is still progressing and will not be completed by statement submission date, but we anticipate completion by July 2021.
 - However top 70% of Scope spend is concentrated in our top 40 vendors. Of these, the majority are multinational consultancy firms that have very detailed practices and policies in place to combat modern slavery.
 - At the time of writing we were unable to sight relevant corporate responsibility policies or modern slavery statements for 10 of the 40 vendors either due to non-response or these businesses not required to submit a statement.
 - The outstanding 10 vendors and a brief high level analysis of the wider vendor database in general are mostly local businesses. Most of these businesses provide professional services or items that have negligible to low risks of modern slavery either by industry/product/geographical location or supply chain practices as outlined in the Global Slavery Index. Therefore, we conclude the assessed risk of Scope contributing to or causing instances of modern slavery are minimal based on this snapshot analysis.

4. Risk Management and Due Diligence

To manage the risks of modern slavery in our supply chain, Scope has revised its procurement practices and undertaken the following measures:

- Amending T&Cs of tender participation to include clauses related to modern slavery (Completed Dec 2020)
- Vendors are now required to declare how they plan to combat modern slavery as part of their tender response. Evidence must be provided to demonstrate their compliance to relevant technical / labour / employment standards and any non-compliant vendors will be automatically excluded from tender process. Excerpt from current tender documentation below for reference. (completed Jun 2020)

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If your organisation is subject to the Modern Slavery Act, please describe the programs or policies in place to ensure human trafficking and slavery do not exist in your operations or supply chain. Please also include any confirmed instances of modern slavery and the steps taken to rectify.

- Thorough investigation of any pricing presented to Scope for products or services in high risk categories as according to the Global Slavery Index, and/or are substantially lower than expected to ensure there is no evidence of modern slavery within their supply chain and manufacturing networks (completed Jun 2020)
- Revision of current Scope supplier agreements to include clauses that uphold the supplier's commitment to combatting modern slavery (Ongoing work – supplier contracts are updated when renewing contracts or entering into agreements with new suppliers)
- Implementation of Supplier Code of Conduct (Code of Conduct in development and approval expected by April 21. Ongoing supplier program to sign up suppliers to code of conduct)
 - Requires suppliers to abide by expected professional conduct including adherence to current Modern Slavery Act and thus actively mitigating any potential for slavery and labour abuse within our supply chain network
 - Any failure or breach results in immediate termination of services without penalty.
 - All suppliers onboarded must agree before work commences and Scope will retrospectively seek compliance once finalised.
- Revision of current Procurement and Contract Management Policy to include changes to vendor onboarding requirements and procurement practices in relation to Modern Slavery risks. This will also include training sessions to all Scope employees involved in purchasing, during which Scope's obligations under the Act will be explained to staff and they must revert with acknowledgement of their individual obligations. (Updated policy by 30 June 2021)

5. Ongoing Assessment of Effectiveness of Risk Management

Scope will proactively monitor the effectiveness and compliance to current and future practices to ensure ongoing governance and that our procurement practices do not contribute to any form of modern slavery. We will achieve this by:

- Procurement Training and Information sessions for any staff member with purchase delegation. This will include a documented acknowledgement of staff that they will abide by the revised Procurement and Contract Management Policy.
- Quarterly Reviews of procurement related data to monitor compliance in relation to purchasing behaviours to ensure ongoing governance.
- Regular audits of vendor onboarding documentation, vendor database and supplier policies to ensure all potential changes that may impact Scope's supply chain and increase our risk of contributing or causing any instances of modern slavery are discovered as early as possible.

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This statement was approved by the Boards of Scope (Aust) Ltd and Home@Scope Pty Ltd.

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Mr David Lloyd Jones

Chair
Scope (Aust) Ltd

23 February 2021

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Date

A handwritten signature in black ink, appearing to read 'Jennifer Fitzgerald', with a long horizontal line extending to the right.

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Dr Jennifer Fitzgerald

Chair
Home@Scope Pty Ltd

1st March 2021

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Date