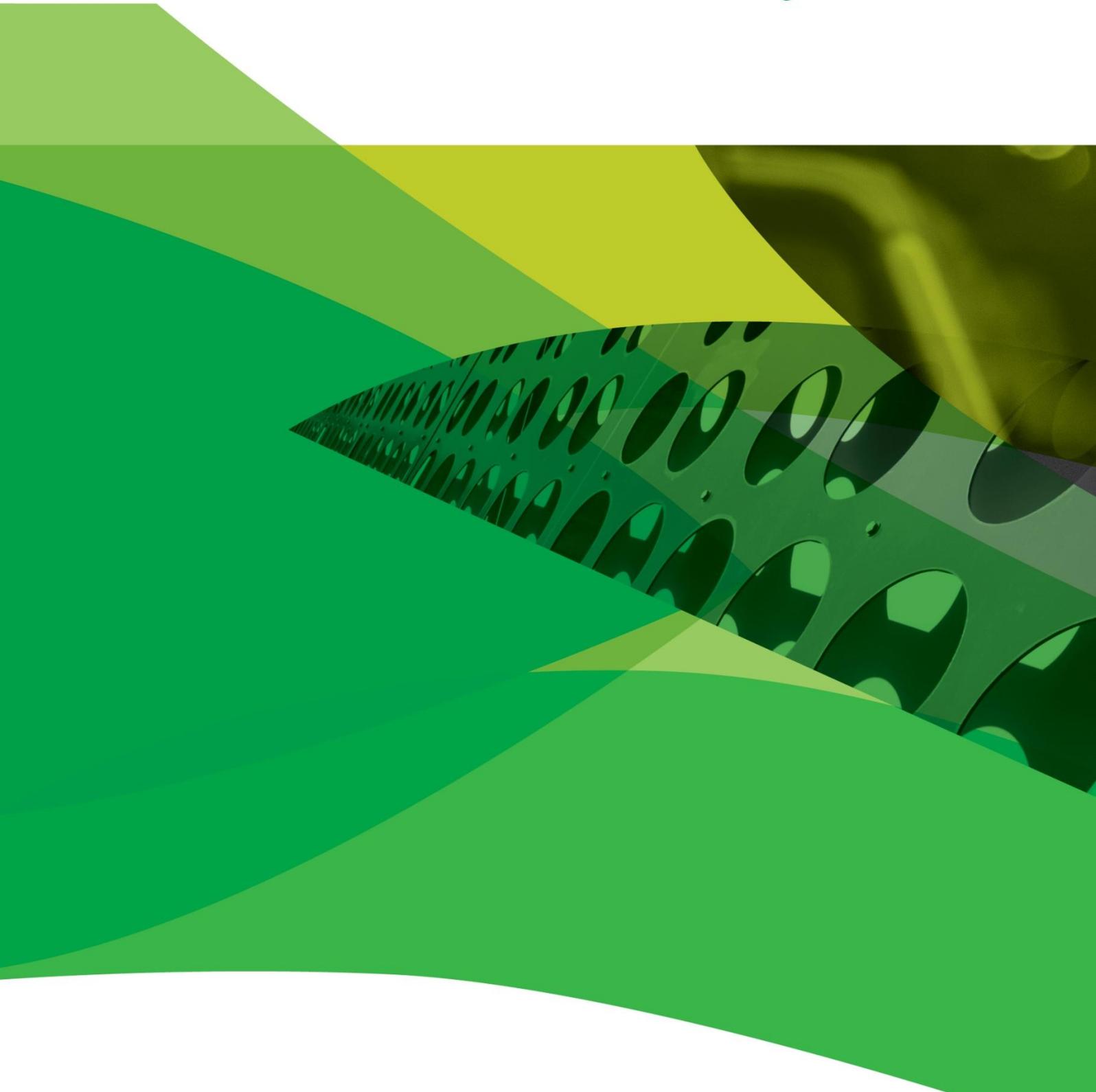


Modern Slavery Statement

December 2023



Contents

Executive summary	3
Commitment.....	3
Our Purpose Vision and Values.....	5
About Our Business	5
Our Operations.....	5
Our Suppliers.....	6
Our Risk Management Approach.....	8
Supplier Risk Assessment	8
Identified Areas of Risk	8
Risk Profile of our Supply Chain.....	9
Additional Risk Considerations.....	13
Assessing and addressing risks.....	13
Our Next Steps.....	16

Executive summary

VicRoads recognises modern slavery is a global issue, which takes many forms of serious exploitation such as human trafficking, slavery, servitude, forced labour, forced marriage, debt bondage and child labour.

Modern slavery is a term used to describe situations where coercion and threats of deception are used to exploit victims and undermine or deprive them of freedom. Modern slavery rarely occurs in isolation. It forms part of other complex challenges and systems, including gender and racial discrimination, weak rule of law and low wages.

The 'Global Slavery Index'¹, an authoritative global study of modern slavery published by leading non-government organisation Walk Free, the Minderoo Foundation (the Global Slavery Index), reports that an estimated 50 million people were living in modern slavery on any given day in 2021, an increase of 10 million people since 2016.

As the custodian of significant registry of personal information in Victoria, we license over four million drivers in Victoria, and register more than 5.8 million cars, motorbikes, trucks, buses, and trailers for the Victorian road network. We are a vital part of the Victorian economy. We work in partnership with the Government for the people of Victoria.

Consistent with our core values and environmental, social, and governance (ESG) strategic objectives of sustainability, we believe as a member of the business community we play an important role in addressing modern slavery by ensuring the goods and services purchased through our mostly Australian-based supply and value chains are ethical and minimise or eradicate modern slavery risks. VicRoads respects the human rights of our people, our partners, our customers, suppliers, and the community we operate in. Our intentions are to identify and manage the risks related to human rights across our business and through our supply chain management.

VicRoads seeks to engage fairly with suppliers to source ethically and sustainably. When engaging new suppliers, we conduct due diligence to assess diverse supplier risks including the risk of modern slavery. VicRoads analysis shows its risk of modern slavery remains low; however, we continue to monitor our exposure by making our supply chains and procurement process more transparent which enables responsible decision-making.

Commitment

This Statement is VicRoads' first Modern Slavery Statement under its new joint venture ownership and was prepared in accordance with the *Modern Slavery Act 2018* (CTH) (the Modern Slavery Act) including to meet the mandatory reporting criteria set out at section 16 of the Modern Slavery Act.

It outlines the steps taken to risk assess and seek to prevent modern slavery practices in the operations and supply chains of the VicRoads Group. The parent of the VicRoads Group for the purposes of the Modern Slavery Act is Voltaire No.1 Pty Limited (ACN 659 838 650) as trustee for the Voltaire No.1 Trust (ABN 29 313 174 758), a private Australian-domiciled trust (Voltaire No. 1 Trust). This Statement by Voltaire No. 1 Trust is in its own right and on behalf of the following entities:

- i. Voltaire No. 2 Pty Limited ACN 659 838 641 as trustee of the Voltaire No, 2 Trust ABN 38 149 668 674, which are owned and controlled;

¹ The country-level data on prevalence of modern slavery (Global Slavery Index 2023)

Modern Slavery Statement December 2023

- ii. R&L Services Victoria Pty Ltd ABN 28 657 005 493 as trustee for the Victorian R&L Services Trust ABN 96 342 123 072, which are owned and controlled and the latter which is a reporting entity;
- iii. Voltaire Australia Pty Limited ACN 656 104 497, which is owned and controlled, and which is a reporting entity;
- iv. Voltaire A Pty Limited ACN 659 566 702 as trustee of the Voltaire A Trust ABN 39 521 761 220, which are not owned nor controlled by Voltaire No. 1 Trust, but are commonly managed;
- v. Voltaire B Pty Limited ACN 659 566 711 as trustee for Voltaire B Trust ABN 52 775 225 841, which are not owned nor controlled by Voltaire No. 1 Trust, but are commonly managed;
- vi. CP Services Victoria Pty Ltd ABN 16 657 005 439 as trustee for the Victorian CP Services Trust ABN 72 128 511 730, which are not owned nor controlled by Voltaire No. 1 Trust, but are commonly managed; and
- vii. Voltaire Australia No. 2 Pty Limited ACN 659 369 614, which is not owned nor controlled by Voltaire No. 1 Trust, but is commonly managed.

By virtue of there being three reporting entities for this year (being Voltaire No. 1 Trust and the entities referred to in the list above in items ii. and iii.), this Statement is a joint statement for all those reporting entities, and also reflects VicRoads Group information that incorporates all the other entities in the list above.

This Statement has been prepared for all reporting entities in the VicRoads Group, and provides a single, consolidated description of their actions to address modern slavery risks.

Executive management and the directors of the reporting entities have been consulted and informed of the actions taken throughout this reporting period.

This Statement has been reviewed by relevant members of the VicRoads Executive and approved by the Board of Directors of the reporting entities.

This Statement for the financial year ending 30 June 2023 was approved by the Board of Voltaire No.1 Pty Limited (ACN 659 838 650) as trustee for the Voltaire No.1 Trust (ABN 29 313 174 758) on 29 December 2023. The Board have delegated authority to the Chairperson and Chief Executive Officer to sign and submit this Statement for and behalf of VicRoads.



Patrick Flannigan AM
Chairperson



Michael Hooper
Acting Chief Executive Officer

Dated: 29 December 2023

Our Purpose Vision and Values

VicRoads purpose is to make services seamless, so we support safer networks for our communities.

Our vision is to be the most progressive registry in Australia.

Our values underpin our business and ways of working. They include;



Diagram 1: VicRoads Values

About Our Business

Our Operations

VicRoads is responsible for licensing over four million drivers in Victoria, and registering more than 5.8 million cars, motorbikes, trucks, buses, and trailers for the Victorian road network. VicRoads' electronic licence testing system is also available in 20 languages and can be used for cars, motorbikes, heavy vehicles, and boats.

VicRoads operates 44 customer access points including Customer Service Centres and Testing and Inspection Centres across Victoria. These centres provide customers with access to registration and licensing services.

VicRoads is supported in the delivery of services by a network of third-party agencies and key suppliers.

The demerit points system VicRoads uses encourages people to be more careful on the road. If drivers do not adhere to road rules, they risk losing points that could eventually lead to their licence or learner permit being suspended.

VicRoads also developed the Hazard Perception Test, a world-first interactive program that tests the skills of an inexperienced driver. This program assesses a driver's reaction to traffic situations, and their ability to make safe driving decisions.

We developed the myVicRoads online account system in response to our customer feedback. This system lets customers pay their vehicle registration online, update personal details, check their licence conditions and status, and receive email and text reminders about due dates for payments.

Using our website, auto traders can register vehicles, fleet operators can renew vehicle registrations, and transport organisations can access driver and licence status reports electronically. Our customers can also order number plates online and find detailed information before purchasing second-hand vehicles.

Our Structure

Each of the entities that we own or control, were engaged in the development of this Statement through the following:

- A common Directors and officers appointed to VicRoads. Each controlled entity within the VicRoads Group shares the same executive management.
- VicRoads has implemented a compliance and risk function across its entire operations and operates as a single business unit.
- Each entity within the VicRoads Group is covered by VicRoads' policies, procedures, and systems, including those relating to contracting, purchasing and human resources.
- Our Board, Executive and Executive leadership team are aware of those activities relevant to our Modern Slavery risk management efforts including our reporting obligations under the Modern Slavery Act.

Our Corporate Governance

Ultimate oversight and responsibility for the steps we take to ensure that we eradicate Modern Slavery practices in our business and supply chains rests with our Board.

Our Audit and Risk Committee (the Committee) plays a pivotal role in ensuring the robustness of our risk management processes and evaluating the effectiveness of VicRoads' performance.

This committee will actively engage in the ongoing scrutiny of our approach to modern slavery risks, conducting thorough assessments to identify, evaluate, and manage potential threats within our operations and supply chains. By employing a proactive monitoring framework, the Committee will track the implementation of risk mitigation strategies and assess their impact on our overall performance.

Our Suppliers

Vic Roads had direct (first tier) supplier relationships with 89 entities during the reporting period 2023. Most of our direct suppliers are Australian companies.

To improve our understanding of our modern slavery risk in 2023, we engaged an external ESG technology and data business, Fair Supply Pty Ltd (Fair Supply) to support our risk assessment process. Our risk assessment is explained in more detail later in this document.

Our Customers, Partners, and Key Stakeholders

VicRoads is a moderate purchaser of goods and services required for our business ranging from single occasion purchases to longstanding contractual relationships.

VicRoads customers are diverse and encompass a broad range of individuals and entities. They primarily include:

- **Individual Drivers:** VicRoads serves the general population of licensed drivers in the state of Victoria, including learners, probationary drivers, and full license holders. Modern Slavery risks may emerge in the supply chain of services related to driver education materials and other resources provided to individual drivers. Reviewing the supply chain and contractors' employment can mitigate these risks.
- **Vehicle Owners:** Vehicle owners in Victoria, whether they own cars, motorcycles, or other vehicles, rely on VicRoads for vehicle registration, licensing, and related services. Modern slavery risks may be present in the production and supply chain of vehicle registration materials and license plates.
- **Transport Operators:** Commercial transport companies and operators, such as logistics and freight companies, rely on VicRoads for permits, licenses, and compliance with transport regulations. Modern slavery risks may be present in the production and supply chain of license plates.
- **Motorcyclists:** VicRoads serves the motorcycling community, providing services related to motorcycle licensing, road safety, and registration. Similar to vehicle owners, modern slavery risks may exist in the supply chains associated with motorcycle licensing.
- **Businesses:** Various businesses engage with VicRoads for fleet management, including vehicle registration and compliance. Modern slavery risks may be present in VicRoads using contractors to assist with vehicle registration and compliance.
- **Government Agencies:** VicRoads collaborates with other government agencies and entities, particularly for the exchange of information and coordination on various matters related to transport, infrastructure, and road safety. Collaboration with other government agencies may involve information exchange and coordination on various matters, potentially introducing risks related to the information technology and communication services used which relate to the supply chain.

Most of our customers are based in Victoria. Customer Services delivers vehicle registration & driver licensing services through face to face, phone, and online channels. Modern slavery risks identified in our clients relate to suppliers and labour hire. Refer to our suppliers and supply chain and people assessments.

Our Risk Management Approach

VicRoads remains committed to taking a proactive, whole-of-company approach to eradicating modern slavery risks across its supply chain and workforce.

Ownership for assessing risk and implementing controls is shared to ensure we safeguard VicRoads from exceeding its risk appetite. Additionally, risk is integrated with strategy and business planning to drive improved performance and outcomes.

Supplier Risk Assessment

To improve our understanding of our modern slavery risk in 2023, we engaged an external ESG technology and data business, Fair Supply Pty Ltd (Fair Supply) to support our risk assessment process. We used FairSupply's proprietary technology, which includes company spend through global markets, to trace the economic inputs required to produce products and services and maps supply chains to ten tiers, representing the suppliers of suppliers up to the tenth supplier.

Tiers 1 to 3 of supply chains are representative of supply chain labour that is "caused" or "contributed" to by a company. Tiers 4 to 10 represent supply chain labour that is "directly linked" to a company's spend.

This process provided VicRoads with a theoretical modern slavery risk across its supply chain incorporating the following:

- Industry;
- Geography; and
- Relative spend.

Identified Areas of Risk

It is important to note that VicRoads has **not** identified any actual or potential instances of modern slavery occurring within the operations or supply chains of our FY23 suppliers. The proprietary risk assessment has analysed *potential* exposure to modern slavery risks.

We have utilised Fair Supply's technology to provide VicRoads with a baseline for identifying and assessing modern slavery risk across our supply chains at an industry and country level based on procurement data for the FY22-FY23 financial year.

This assessment has analysed the cumulative modern slavery risk through to the tenth tier of our supply chains, through assessing the interaction between the following factors:

- Total supplier spend amount (i.e. the value of our direct supplier contracts)
- Industry category, including industries that, in turn, rely on economic inputs further down the supply chain.
- Geographical location of operations.
- Depth of tiering within global supply chains.

VicRoads has an overall theoretical modern slavery risk across its supply chain of **low**, and VicRoads considers other than standardising modern slavery into our supplier due diligence for new material suppliers (with a high projected annual spend), there is no requirement for immediate supplier risk-based actions to understand or further mitigate any instances of heightened Modern Slavery risk across our supply chain.

VicRoads Registration and Licensing Services

Modern Slavery Statement December 2023

- 1.1086 The estimated number of people in forced labour in Vic Road's supply chain
- 0.0101 The estimated number of people in forced labour in Vic Road's supply chain **per million dollars spent**
- 0.7858 The estimated number of people in forced labour in Vic Road's supply chain **mapped from tier 1 to tier 3**
- LOW Vic Road's potential to cause, contribute or be directly linked to modern slavery, including in its supply chain

Vic Roads current assessment determined that our potential to cause, contribute to or be directly linked to modern slavery, including in our supply chain, is **low**.

Risk Profile of our Supply Chain

Risk by Vic Roads Suppliers

Using procurement data for the 2022-2023 financial year, the proprietary risk assessment has prioritised the following suppliers as having the highest exposure to modern slavery risk:

Supplier	Commentary
Indian based software provider:	Although Vic Roads only had a single supplier in this industry category, this supplier has an elevated risk of modern slavery because of its operational activities in India. While the direct operations of a software provider are likely to be reliant on a skilled and educated workforce who are generally less likely to be vulnerable to exploitation, the updated findings from the 2023 Global Slavery Index continue to rank India, on the global scale, as a high-risk country for modern slavery risk.
An Australian based electronics and lighting distributor.	The modern slavery risks associated with this supplier are the use of high-risks electronic inputs. A general description of the supply chain risks for electronic products are set out below for the <i>Australian Computer and Related Services Sector</i> .
US and Singapore based global technology and software suppliers.	These suppliers are considered higher risk because of their reliance upon high-risk computer products. A general description of the supply chain risks for computer products is set out below for the <i>Australian Computer and Related Services Sector</i> .

Risk by Industry

VicRoads highest tier 1 to 3 supply chain spend occurs across the other business services industry with 39% direct spend in this sector. Other business services are services which support businesses to deliver their output.

This encompasses a broad range of services such as accounting, legal advice, provision of outsourced labour, market research, cleaning, advertising, and consulting services.

#	Industry	Estimated people in forced labour	%
1	Other business services	0.4279	39%
2	Textiles	0.0837	8%
3	Retail trade services, except of motor vehicles and motorcycles; repair services of personal and household goods	0.0627	6%
4	Wholesale trade and commission trade services, except of motor vehicles and motorcycles	0.0393	4%

Table 1 - Estimated people in forced labour by industry

A brief description in relation to the potential nature of identified modern slavery risks for each of the following industry categories is set out below.

- Australian Business Services
- Australian Computer and Related Services
- Australian Public Administration Services
- Australian Post and Telecommunication Services

Australian Business Services and Australian Computer and Related Services Sectors

These industries include a wide range of suppliers, from large multinational reporting entities to smaller Australian based businesses.

Both industries have been flagged due to their day-to-day reliance on high risk-supply chains, including computer and electronic products. The potentially elevated risks associated with these industries are likely to be occurring deeper within the supply chain for these key electronic products.

The supply chain for computer and electrical goods is exposed to modern slavery risks at multiple stages. Typically, the manufacture and assembly of computer and electronic goods occurs in high-risk countries such as China and Malaysia, where there is an elevated risk of forced labour and deceptive recruitment practices. There are also identified risks with the extraction of raw materials used for components, such as the mining of cobalt for laptop batteries.

Walk Free Foundation's updated 2023 Global Slavery Index classifies electronics as the highest value product group for forced labour risk based on the overall import activity of G20 countries.²

² <https://www.walkfree.org/global-slavery-index/findings/importing-risk/>

Other known risks to Australian business services include cleaning and facilities management contracting. Both the cleaning and facilities management industry are often reliant upon vulnerable workforces, such as low skilled temporary workers sourced via labour hire companies, or migrant workers whose immigration status is linked to their employment. Additionally, the cleaning industry has also been identified by Walk Free's updated 2023 Global Slavery Index as higher risk sector for forced labour practices within Australia.³

Australian Public Administration Services Sector

The Australian Public Administrations Services sector includes state-based government departments and services that we engage with to deliver our licensing and registration services.

The risks within this sector are largely consistent with the *Australian Business Services and Australian Computer and Related Services Sectors*, i.e. there is a dependence on computers and electronic componentry in these departments along with risks associated with other Australian Business Services as described above. We also have a large procurement spend with entities in this sector, which also contributes towards the elevated risk profile. However, in considering our responsibility to undertake due diligence, we recognise that the higher our procurement spend is within a particular industry, the greater influence we may have to leverage collaborative action.

Australian Post and Telecommunication Services Sector

The Australian Post and Telecommunication Services Sector has also been identified by the risk assessment as higher risk because of the use of higher risk supply chain inputs such as electronic devices, electrical switches, and cabling. These types of electronic equipment are often manufactured using potentially high-risk componentry and raw material inputs, such as conflict minerals.

The telecommunications sector is also reliant upon the construction industry, to assist with the construction and maintenance of telecommunication networks. The construction industry is considered higher risk because of industry practices such as using foreign migrant workers for unskilled roles, use of labour hire agents and a lack of transparency over subcontracting arrangements. The Walk Free Foundation's updated 2023 Global Slavery Index has also identified the construction industry as a higher-risk Australian sector, particularly for forced labour practices.⁴

Risk by Geography

Our greatest source of potential geographical risk exposure, as assessed by the proprietary technology, is with our Australian based suppliers. This is because the proprietary algorithm has factored in our relative spend. Therefore, while Australia may not be a high-risk country on a global scale, our high overall spend on Australian suppliers has resulted in a heightened geographical risk profile.

³ <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

⁴ <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

VicRoads Registration and Licensing Services

Modern Slavery Statement December 2023

The risk assessment has also flagged that India is our second greatest area of geographical risk. As described above, Vic Roads has a single software supplier based in this country. India is considered a higher risk country, which is confirmed by the 2023 Global Slavery Index, as detailed in the extract below:⁵

"India has an estimated prevalence of 8 people in modern slavery per 1,000 of the population, which means that there is an estimated 11,050,000 people living in slavery. India is ranked the 6th highest country in the APAC region on the basis on estimated prevalence of modern slavery."

VicRoads analysis confirms the majority of direct spend across its suppliers is predominantly within Australia, however there is some direct spend also across suppliers in India and China.

The table below (below) represents the estimated number of people in forced labour in VicRoads supply chain by geography, mapped to tier 3. Consistent with VicRoads suppliers being predominantly Australian based, the majority (55%) of the estimated number of people in forced labour is in Australia, which has been identified as having low prevalence of modern slavery risk.

This further reinforces to VicRoads that supply chain due diligence have resulted in significantly reduced geographical supply chain forced labour threat.

Country	Estimated People in Forced Labour to Tier 3	% Total
Australia	0.6149	55.467
India	0.122	11.218
China	0.0862	7.774

Table 2: Estimated people in forced labour by country (total) to tier 3.

Risk by Tier

Our risk assessment has also analysed our cumulative exposure to modern slavery across the tiers of our supply chain. Our potential modern exposure to modern slavery is concentrated within **tier one** of our supply chain.

One key factor that has contributed to this result is our engagement with a direct supplier in India, where potential exposure to modern slavery practices is more proximate.

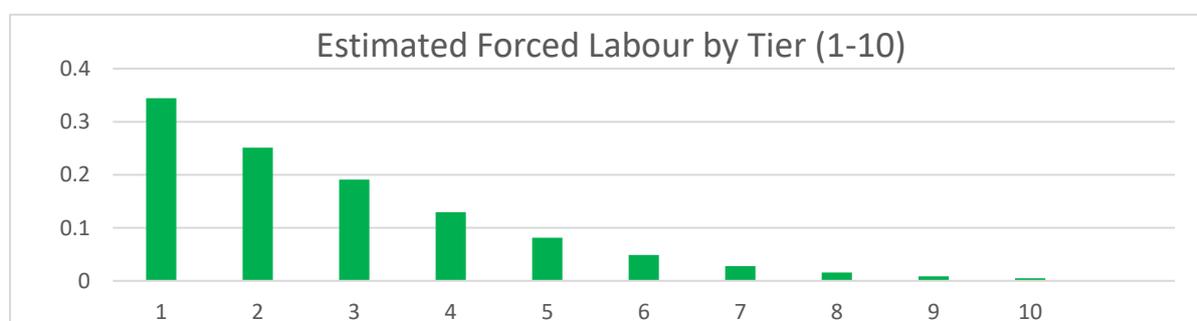


Diagram 2: Risk by Tier (Tier1 - Tier 10)

⁵ <https://www.walkfree.org/global-slavery-index/findings/regional-findings/asia-and-the-pacific/>

Additional Risk Considerations

VicRoads supplies Victorian community with vehicle registration plates on behalf of the Government. VicRoads is committed to delivery of this service via a contract inherited on commencement of the Joint Venture.

VicRoads has considered implications of modern slavery across all facets of its supply chain including contracted services. VicRoads has considered if modern slavery risks may be present with the production of vehicle registration plates, one of those risks being the use of prison labour for some plates.

VicRoads has assessed the risk associated with the use of prison employment by Corrections Victoria (being part of the supply chain for the production of some plates) as low to nil.

This is on the basis of VicRoads having received information from Corrections Victoria, that prison industries are operated within the requirements of the Charter of Human Rights and Responsibilities Act 2006 (the Charter). This is monitored via the ongoing assessment of the Corrections Victoria Deputy Commissioner's Instruction on Prison Industries 3.03.

VicRoads will continue to assess the benefits (reskilling, post detention employment and repatriation opportunities), versus the modern slavery risks associated with the use of prison labour. VicRoads will report on these considerations in the next reporting period.

Assessing and addressing risks

VicRoads recognises that following the review of Australia's Modern Slavery Act in March 2023, we can expect a stronger and more robust Act.

Our focus remains, year on year, to apply a continuous improvement approach to monitoring our supply chain, maintaining our supplier risk profile and implementing recommendations for uplift, with a view to prioritising higher risk operational and supply chain risks.

The key activities in place for this reporting period, including those that assist us with continuous oversight of our supply chain, and our future mitigation plans are highlighted below.

Our Systems, Processes, Policies, and Procedures

We have established policies relevant to identifying, assessing, and mitigating the risks of Modern Slavery practices in our business as listed below. Our policies ensure that we meet our ethical business objectives and comply with our legal obligations. These policies are approved in accordance with our internal Delegations of Authority Policy and apply to all the entities we own and control.

Our key systems, processes, policies, and procedures which currently relate to the control of Modern Slavery risks include:

- General Policies which ensure we act ethically and with integrity observing fundamental aspects of human rights in all our business and employee relationships.
- Pre-Employment Screening which ensures VicRoads adopts robust practices and concerning employment screening (including work eligibility checks), employment conditions (including fair pay and hours) and appropriate workplace behaviour.

Modern Slavery Statement December 2023

- Supplier and procurement policies which consider the industry, geography and potential modern slavery impacts across each supplier engagement.
- Safe workplace which maintains commitment to equal opportunity and is free from discrimination, harassment, and victimisation. VicRoads is also committed to maintaining an environment where staff feel comfortable raising issues or concerns including those related to modern slavery and do not experience detriment because of speaking up.

ESG Reporting

VicRoads commenced participating in annual global ESG benchmarking to measure VicRoads' performance across all material social, governance and environmental issues including aspects of Modern Slavery.

The ESG framework we use, assesses various social aspects, such as human rights, labour standards, and community engagement, as part of its evaluation process.

Our People

VicRoads only engages full time or part time employees. VicRoads does not engage casual employees. During the 2023 financial year, VicRoads employed 980 employees with 80% full time; and 20% part time. Most VicRoads' employees are Australian citizens or Australian permanent residents.

VicRoads engages employees subject to one of the following:

- an enterprise agreement (the two which apply to VicRoads are: VicRoads EA9 | Fair Work Commission (fwc.gov.au) and Victorian-Public-Service-Enterprise-Agreement-2020.pdf (www.vic.gov.au) - the enterprise agreement that will apply will depend on the employee's role); or
- an individual contract, which is underpinned by a relevant modern award (relevant one is: FWO - Award Viewer - MA000002 (fairwork.gov.au)) and/ or the Fair Work Act 2009 (particularly the National Employment Standards (National Employment Standards - Fair Work Ombudsman).

All the terms and conditions which regulate the employee's service (and with which VicRoads must comply) are set out in the above documents. VicRoads assesses its employment arrangement regularly through the implementation of its Workplace Relations Strategy.

Cross Functional Working Group

We have established a group in VicRoads through which we monitor and manage modern slavery risks related to our business activities.

This team engages to monitor risks associated with modern slavery and takes informed action to mitigate emerging risks.

The Working Group comprises, as required, of representatives from Risk and Compliance, People and Culture, Legal, Procurement, Enterprise Project Management Office, and Corporate Communications teams.

Modern Slavery Statement December 2023

This group aims to:

- share information on modern slavery actions across the business,
- to embed modern slavery and broader human rights knowledge deeper into our businesses,
- to provide key inputs and consultation into the development of this statement, and
- updates to Executive Leaders, the Audit and Risk Committee and Board.

Due Diligence and Remediation

In our commitment to combat modern slavery, we have undertaken a comprehensive approach encompassing identification, assessment, and remediation of associated risks within our business operations.

Supported our governance arrangements, and led via the Cross Functional Team VicRoads due diligence includes;

- Analysis and discovery: identification of modern slavery risks relevant to our operations, involving a thorough examination of our supply chain and annual assessment of internal processes,
- Supplier verification: assessment of our supplier's modern slavery statements including assessment of their practices for identification, measurement, and monitoring of modern slavery risks,
- Internal policy and practice: annually we scrutinise our internal policies and procedures to ensure they robustly address and mitigate modern slavery risks, and
- Culture: we continuously review and enhance our training, communication and information sharing practices to foster a culture of ethical conduct throughout our organization.
- Assurance: we apply quality assurance and internal audits across our end-to-end operation to ensure effective consideration and adoption of practices which may introduce modern slavery risk.

Effectiveness and performance indicators

While our business operations and activities are considered to present a low risk for modern slavery, we are committed to minimising the risk of all forms of forced labour within our business.

We are enhancing our monitoring and effectiveness in combatting modern slavery and will commence monitoring the following performance indicators:

Indicators	% Staff completion rate Code of Conduct Training
	% Supplier Audits including modern slavery assessment
	% Fit for purpose Supplier contracts
	Number of emerging modern slavery risks or reports

Reporting

In this inaugural year of reporting and under the establishment of our new joint venture, we acknowledge the significance of evaluating the effectiveness of our Modern Slavery risk management framework. As we navigate this initial phase, it is essential to recognise the evolving nature of our organisational structure and functions.

In embracing transparency, we openly acknowledge that this year marks the beginning of our reporting journey, and while we are committed to building on our efforts, we also recognise areas for enhancement. Through this iterative process, we aim to strengthen our framework and contribute positively to eradicating Modern Slavery from our operations.

Our Next Steps

During the 2023-24 financial year, we are expanding our supplier due diligence processes by:

- Mapping the supply chain to identify risks. Asking Where, How and Who questions. Knowing the supply chain is the first step in identifying the risks, assessing the risks, and putting actions in place to address and provide remedy if required.
- Ensuring that in the procurement of goods and services, new vendors are assessed for modern slavery risks as part of the assessment and evaluation process.
- Engage with key suppliers to further understand how they are addressing their modern slavery risks - using a supplier questionnaire.
- All new and existing contracts are reviewed for fit for purpose and inclusion of modern slavery paragraphs to enable prevention and detection of Modern Slavery risks.
- Further identification of existing credible assessments of entities in our supply chain, such as audit reports, NGO reviews, and any modern slavery statements submitted by the suppliers to the Government's Online Modern Slavery Register.
- We continue to explore processes and systems to strengthen our controls as part of our initial onboarding and continuous monitoring of our suppliers.