



# Voluntary Modern Slavery Risk Statement

Financial Year Ended 30 June 2023

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# REPORTING ENTITY

## STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

Be Slavery Free is the business name of STOP THE TRAFFIK (ABN 33 160 723 348 registered in 2012). STOP THE TRAFFIK was the first charity registered with the Australian Charities and Not for Profit Commission and that registration continues. STOP THE TRAFFIK operates the STOP THE TRAFFIK Public Fund and donations by individuals to that fund have Deductable Gift Recipient status. The registered office is SAP House, Level 5, 224 Bunda Street, Canberra City, ACT 2601.

### STRUCTURE

Be Slavery Free is a coalition of civil society organisations with on-the-ground experience in preventing, disrupting and remediating modern slavery. The governance of Be Slavery Free is undertaken through the members and an elected Board of Directors. Members are completely autonomous legal entities who voluntarily choose to collaborate for the purposes of ending slavery and slavery-like practices in all its forms.

### OPERATIONS

We believe everyone has a role to play in ending the demand and supply of slavery. Our advocacy and resources empower others to help the world be slavery free.



## BUSINESS & INVESTORS

- **We activate** the co-design of slavery-free business practices to prevent and disrupt slavery, through learning and working with business and industry leaders across multiple sectors
- **We collaborate** to enable learning within and across industry sectors to establish innovative and practical solutions through our Business Association
- **We educate** Australian companies with services that showcase best practice solutions to mitigate the risks of slavery in supply chains and lead industries in Modern Slavery Act reporting
- **We curate** and deliver business-to-business discussion on compliance requirements, industry standards and how to lead the fight against slavery
- **We innovate** solutions to address the complexity of ending modern slavery through catalysing shared responsibility across sectors and industries



## CONSUMERS

- **We activate** community-based campaigns to raise awareness and change consumer behaviour
- **We collaborate** using our shared responsibility model to focus the responsibility of consumers to drive the demand for slavery-free supply chains and products
- **We educate** consumers about how their purchasing decisions drive demand for slavery with a specific focus on raising awareness of the issues with young people, faith-based communities and the media
- **We curate** opportunities for consumers and constituents to request change from companies and retailers they buy from, and from their parliamentarians
- **We innovate** by researching modern slavery in supply chains of high-risk businesses and transforming this knowledge into actions and attitudes aimed to achieve the abolition of modern slavery



## GOVERNMENT



## CIVIL SOCIETY

- **We activate** timely and responsive policy dialogue to help position Australia as a leader in the fight against modern slavery
  - **We collaborate** with other civil society groups to bring a focused voice to policy making
  - **We educate** parliamentarians and public servants about best practice and evidence-based policy solutions
  - **We curate** opportunities for governments to hear the needs and demands of the public and business, and learn from international experience
  - **We innovate** by creatively exploring how government can be supported by other sectors and can in-turn can be supportive of new approaches locally to internationally
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- **We activate** the potential influence civil society can have in ending slavery
  - **We collaborate** with civil society to work together with partners to prevent, abolish and disrupt modern slavery in Australia and around the world
  - **We educate** the wider community on the harm and abuse of modern slavery through our civil society networks
  - **We curate** gatherings of civil society, especially small and medium size groups, with a focus on practices to end slavery
  - **We innovate** by teaming with academics and civil society to visualize data and connecting research and strategic action with evaluation and creatively invent fresh approaches

## SUPPLY CHAIN

Be Slavery Free has no employees. It contracts other businesses and sole traders to undertake the tasks necessary for its operations. These contractors supply the equipment necessary to fulfill their contracts. Any new supplier is required to show the entirety of their supply chain is traced and steps have been taken to address slavery and slavery-like practices in all its forms.

The additional major services procured by Be Slavery Free are that of 'off-the-shelf' software platforms. The primary suppliers are headquartered in Australia, The Netherlands, Republic of Ireland and the USA and considered low-risk of using off-shore forced labour in their development.

From time to time Be Slavery Free also procures merchandise. This financial year, we procured about 30 t-shirts to gift to our contractors who worked on the Chocolate Scorecard project. The cotton for these are grown by small-hold famers in Uganda. The cotton is ginned in Kasese,

western Uganda and then sent to Kampala, Uganda and made into cotton fabric. This part of the process is overseen by the Cotton Made in Africa network. Fabric is then shipped to Kiboko, Kenya to the only garment manufacturer in Kenya guaranteed by the World Fair Trade Organization. Unprinted T-shirts are shipped to the Empower Collection in Brisbane, Australia.

We purchase a limited number of other products, however when we do, we prioritise purchasing of goods that have traced their supply chain. For example, when providing gifts to speakers and guests at events we usually give gifts of chocolate procured from Haigh's, Tony's Choclonely or Whittaker's chocolatiers. In each case, these companies have traced their cocoa or beans to the farm where it is grown and harvested. Systems for monitoring child labour and remediating the same are in place.

# RISKS OF MODERN SLAVERY IN OPERATIONS & SUPPLY CHAIN

Be Slavery Free takes all efforts to ensure we do not cause, contribute to, or are directly linked to modern slavery. Any new supplier will be required to show the entirety of their supply chain is traced and steps have been taken to address slavery and slavery-like practices in all its forms.

Of major concern is appropriate due diligence in relation to the travel undertaken by contractors to locations where human traffickers and slave traders operate. The potential personal risks connected with 'calling out' such organised crime can be considerable. Further, the methods used by such persons and gangs can involve public naming and shaming to discredit and denigrate those who expose their actions.

# ACTIONS

## ADDRESSING RISKS

Be Slavery Free seeks to uphold and promotes the UN Guiding Principles on Business and Human Rights in all its campaigning, training and research.

### Human Rights

- [Principle 1](#): Businesses should support and respect the protection of internationally proclaimed human rights; and
- [Principle 2](#): make sure that they are not complicit in human rights abuses.

### Labour

- [Principle 3](#): Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- [Principle 4](#): the elimination of all forms of forced and compulsory labour;
- [Principle 5](#): the effective abolition of child labour; and
- [Principle 6](#): the elimination of discrimination in respect of employment and occupation.

Be Slavery Free provides training for businesses on topics including processes for remediation. We also regularly provide businesses and other entities with advice concerning how best to engage in effective and trauma-informed remediation processes.

The risks to contractors travelling in areas where human traffickers and slave traders operate is mitigated as follows:

- Clear itineraries developed with local NGO's and contacts who are aware of the context and ways to address or avoid potential danger
- Working in collaboration with people on-the-ground who are aware of the signs, and able to advise if changes to itineraries are needed

# ASSESSMENT

## EFFECTIVENESS OF ACTIONS

Be Slavery Free uses an evidence-informed approach to assessing its progress in its campaigning in particular. We closely monitor the response of governments, business and consumers. The case study below highlights the need for consistent and long-term approach to bring about change in policy at a government level.

### **CASE STUDY: STRENGTHENING OF MODERN SLAVERY ACT 2018 (CTH)**

The Modern Slavery Act 2018 (Cth), which commenced in Australia on 1 January 2019, was considered one of the world's most comprehensive laws at that time to tackle issues of modern slavery and forced labour within supply chains. Despite lacking certain key provisions advocated by Be Slavery Free (formerly STOP THE TRAFFIK), such as an Anti-Slavery Commissioner and penalties for non-compliance, its introduction prompted major companies across Australia to prioritise the issue of modern slavery in their boardrooms, a cause for celebration.

The Act included a mandated comprehensive review after three years (referred to as the Review) to thoroughly examine how the Act was being implemented and its impact. The Review, completed and presented on 25 May 2023, authored by Professor John McMillan, acknowledged a lack of solid evidence demonstrating meaningful change for individuals living in conditions of modern slavery.

This Review became an opportunity for civil society organisations like Be Slavery Free to push for strengthening the Act to effectively combat exploitation and modern slavery deeply entrenched within global supply chains. Be Slavery Free led a collaborative [submission](#) involving 24 other organisations, presenting 11 recommendations. It was gratifying to note that most of these recommendations, either in full or in part, were included in the 30 recommendations put forward by Professor John McMillan.

Among the 30 recommendations made by the Review, we believe the following five (all proposed recommendations by Be Slavery Free) have the potential to significantly impact vulnerable populations:

1. **Establishment of an Anti-Slavery Commissioner:** Advocated as an independent pillar within Australia's response to modern slavery, this office aimed to oversee compliance



and raise awareness. The Review stressed the need for a high-profile appointment and broad powers, echoing global best practices and urging the issuance of declarations identifying high-risk regions and supply chains.

2. **Adoption of a Due Diligence Approach:** Shifting from a mere reporting framework to a proactive 'duty to prevent' modern slavery aligned with global trends, compelling entities to take effective action in identifying, assessing, and addressing risks.
3. **Widening the Scope of Reporting Entities:** By lowering the revenue threshold to \$50 million, an additional 2,400 entities could fall under the Act's purview, expanding accountability across industries.
4. **Introduction of Penalties for Non-compliance:** Proposed penalties sought to ensure consistent adherence to reporting guidelines, enhancing overall reporting quality and compliance levels.
5. **A Complaints' Procedure:** Envisioned as a public platform for grievances, this procedure aimed to bolster transparency and engagement, empowering civil society to actively monitor compliance.

On 30 November 30 2023, The Modern Slavery Amendment Bill 2023 (the Bill) was tabled in Parliament outlining the creation of the office of an Anti-Slavery Commissioner, signalling that the Government is taking concrete steps to turn the 30 recommendations into reality.

Be Slavery Free will participate fully in the inquiry process of the Bill and will continue to advocate for all recommendations of the Review to be implemented in full.

## APPROVAL BY BOARD

Approved by the Be Slavery Free Board on 30 December 2023.

A handwritten signature in black ink, appearing to be 'Darian McBain', with a stylized flourish at the end.

**Dr Darian McBain**

Chair of the Board of Directors

Be Slavery Free

Date : 30 December 2023