

Defence Housing Australia Modern Slavery Statement

Reporting period 1 July 2022 to 30 June 2023

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Foreword

Defence Housing Australia (DHA) acknowledges that modern slavery is an overarching term covering a range of exploitive practices including slavery and slavery-like practices, servitude, forced and bonded labour, human trafficking, and the worst forms of child labour. These abhorrent human rights violations present a complex and far-reaching global problem.

We recognise that our business operations are not immune to elements of modern slavery and we will not turn a blind eye. We are committed to strengthening our response to modern slavery and continually improving our ability to identify and address risks in our supply chains and operations.

As an Australian Government agency we join the global effort to combat modern slavery by collaborating with our partners and industry experts to better understand our risk profile and help map a path forward. We have zero tolerance to any kind of modern slavery across our operations and remain alert to this risk across our business practices. We will continue to develop and apply strategies to build capability and understanding, internally and externally, of where risk factors of modern slavery may exist.

For the 2022–23 financial year DHA has not identified any specific instances of modern slavery harm. We are committed to reducing the risk of modern slavery through the implementation of effective policies and procedures that provide for transparent and accountable procurement and purchasing. We are dedicated to obtaining goods and services through ethical means and not supporting domestic or international businesses that exploit individuals for profit.

DHA is proud to report on our ongoing action to understand, identify and address the risk of modern slavery in our operations and supply chains for the 2022–23 financial year. Based on our learnings over the past three years and following an internal review on DHA's compliance with the *Modern Slavery Act (Cth) 2018*, we have realigned our commitments to deepen our transparency of high-risk suppliers and continue to improve how we assess and mitigate modern slavery risks across our enterprise.

The DHA Board is pleased to submit this fourth Modern Slavery Statement under section 15 of the *Modern Slavery Act (Cth) 2018*, for the 2022–23 reporting period, and commends this Statement as an assertion to DHA's determination to combat modern slavery in all its forms.



Hon J.A.L. (Sandy) Macdonald AM
DHA Board Chair

Overview

Scope

This Modern Slavery Statement (Statement) was prepared by the reporting entity Defence Housing Australia ('DHA' 'the Company') (ABN 72 968 504 934), the Company's principal place of business and registered office is 35 Hinder Street, Gungahlin ACT 2912. There were no other owned or controlled entities during the reporting period.

This Statement has been prepared in accordance with the *Modern Slavery Act (Cth) 2018* (the Act) and outlines the actions taken by DHA to identify, assess, and address modern slavery risks across our operations and supply chains for the financial year ending 30 June 2023.

This statement was approved by the DHA Board on 7 December 2023.

Mandatory Criteria for Modern Slavery Statements

Criteria	Section within the Statement	Page #
Criteria 1 – Section 16(1)(a) Identify the reporting entity	Overview	4
Criteria 2 – Section 16(1)(b) Describe the structure, operations, and supply chains of the reporting entity	Business and Supply Chain	7–13
Criteria 3 – Section 16(1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity	Risk of Modern Slavery Practices	14–17
Criteria 4 – Section 16(1)(d) Describe the actions taken by the reporting entity to assess and address those risks, including due diligence and remediation processes	Risk of Modern Slavery Practices, Assessing and Addressing Modern Slavery	14–21
Criteria 5 – Section 16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions	Effectiveness	22
Criteria 6 – Section 16(1)(f) Describe the process of consultation with any entities that the reporting entity owns or controls	Consultation	23
Criteria 7 – Section 16(1)(g) Include any other information that the reporting entity considers relevant	Future Focus	24–26

Approach

This is DHA's fourth statement and describes actions undertaken to understand and address modern slavery in our operations and promote greater transparency in our supply chains. We recognise this is a work in progress and are adopting a continuous improvement approach to modern slavery risk management.

So, as we learn more each year and gain experience, we will improve risk management. Areas for further improvement to identify and address risks, both current and emerging are also outlined in the Future Focus section within this Statement.

Key Achievements in the 2022-23 Financial Year

Key improvements in this reporting period include:



Enabling consideration of modern slavery throughout procurement processes through enhancements to the procurement framework
Introduction of the Modern Slavery Workplan which details the actions and commitments DHA has identified for implementation to improve DHA's management of modern slavery risk

Varied existing contracts (if executed prior to the adoption of the standard Modern Slavery contract clauses) that are valued over \$250,000 and considered high-risk

Monitored compliance and effectiveness of the Modern Slavery Awareness Act eLearning Module which had achieved an 89% completion rate

Engaging with existing high-risk suppliers to undertake the Modern Slavery Supplier Questionnaire

Business and supply chain

Role of DHA

Defence Housing Australia (DHA) was established in 1988 to meet the operational needs of the Defence Force and the requirements of the Department of Defence by providing adequate and suitable housing for, and housing related services to:

- › members of the Defence Force and their families;
- › officers and employees of the Department and their families; and
- › persons contracted to provide goods or services to the Defence Force and their families.

DHA delivers committed support for Australian Defence Force (ADF) capability through the provision and management of almost 17,000 housing solutions for ADF members and their families. DHA also provides additional housing support services to Defence through the provision of housing benefit administration, temporary accommodation management, housing project management and heritage housing management services.

DHA is a corporate Commonwealth entity and Government Business Enterprise (GBE) operating under the provisions of the *Defence Housing Australia Act 1987* (DHA Act), the *Public Governance, Performance and Accountability Act 2013* (PGPA Act), and the *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule).

2022-23 in summary

We support Defence capability by providing housing for, and related services to ADF members



15,681
ADF members and
their families housed¹



6,715
Housing allocations²



6,250
Welcome visits³



16,119
ADF members in receipt
of rent allowance²



9,955
Rent allowance applications³



201,050
Living in Accommodation bookings⁴



172,324
Calls handled
DHA Contact Centre³



1,123,840
Times ADF members logged into
Online Services³



237,996
Maintenance work orders raised³

1 Represents the number of ADF members and their families living in a DHA managed property as at 30 June 2023.

2 As at 30 June 2023.

3 During 2022-23.

4 Represents the number of bookings with an accommodation start date within 2022-23.

We deliver value for the Australian Government by managing a property portfolio to meet Defence requirements



16,929

Properties under management²



12,042

Properties leased from investors²



2,545

Total property additions to the portfolio³



89

Properties added to the portfolio from DHA constructions³



56,317

Property inspections undertaken³



137

Properties added to the portfolio through acquisitions³



\$695,331

Invested in maintenance and management of heritage properties³

Organisational structure

Shareholder Ministers

Two Shareholder Ministers oversee the Australian Government's interests in Defence Housing Australia (DHA), the Minister for Defence and the Minister for Finance. As DHA is a part of the Defence portfolio of the Australian Government, the Minister for Defence or their delegate is DHA's responsible Minister. The Minister for Defence has delegated responsibility to the Assistant Minister for Defence. The Minister for Finance is responsible for overseeing DHA's funding arrangements and, amongst other things, providing Shareholder advice on all Government Business Enterprises, including DHA.

Board and committees

A Board of Directors is established in accordance with Part III of the *Defence Housing Australia Act 1987* (DHA Act) and is the Accountable Authority for DHA under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act). The Board is responsible for the proper and efficient performance of DHA's functions. The Board makes decisions on organisational direction and strategy, which are articulated through a publicly available Statement of Corporate Intent.

All Directors are appointed by the Minister for Defence, or their delegate, except the Secretary of the Department of Finance's nominee who is appointed by the Minister for Finance, and the Managing Director who is appointed by the Board.

In accordance with section 26(1) of the DHA Act, the Board has established four committees to assist in the discharge of its duties. The Board and each of its committees has a charter that sets out its purpose, composition and meeting and administrative arrangements. The Board considers the composition of committees periodically.

The committees include:

- › Board Audit and Risk Committee;
- › Board Investment Committee;
- › Nomination and Remuneration Committee; and
- › People and Culture Committee.

Amendments to the DHA Act in 2006 established the DHA Advisory Committee to advise on the performance of DHA's functions (refer to Part IIIA of the DHA Act).

Managing Director

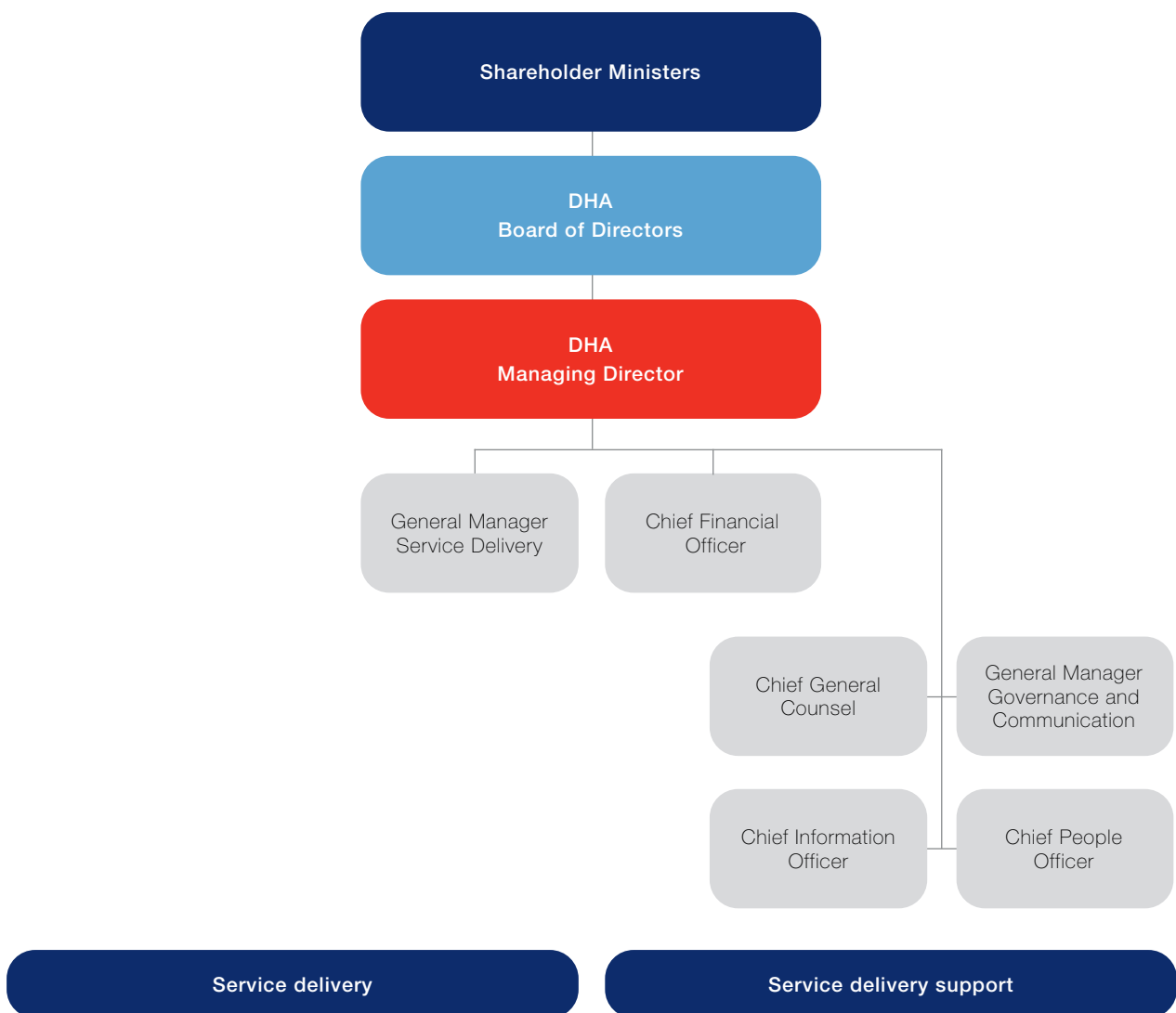
The Managing Director is appointed by the Board and is the only executive director of the Board. The Managing Director is responsible for conducting the affairs of DHA in accordance with the DHA Act and any policies determined by, and directions given by, the Board. The Managing Director oversees DHA's strategic direction, organisational structure, staff, performance, and relationships with key stakeholders.

Leadership Team

The Leadership Team supports the Managing Director to fulfill DHA's purpose by providing leadership, guiding performance, implementing and delivering against the Statement of Corporate Intent.

Figure 1

DHA organisational structure as at 30 June 2023

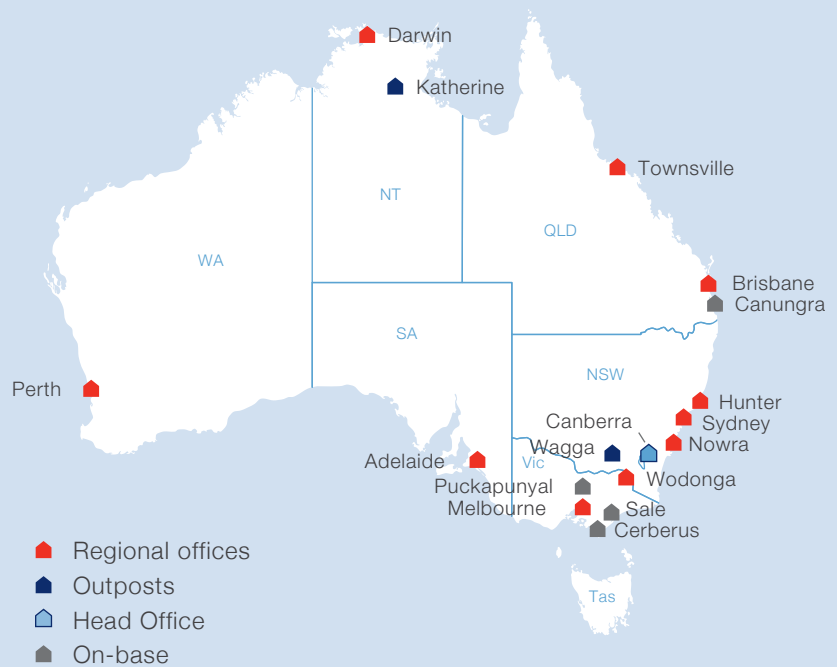


Office network

DHA has offices in 17 locations nationally (refer to Figure 2). Our offices, in conjunction with our technology systems support flexible working arrangements, a culture of collaboration, and individual staff needs through multi-faith and carers facilities. DHA staff are also located in four on-base locations at Sale, Puckapunyal, Cerberus (Victoria) and Canungra (Queensland) in accordance with a license agreement with Defence. Staff in our regional offices deliver customer facing services to ADF members, their families, and our landlords. Regional office staff are supported by staff in contact centres, who are the first point of contact for housing services, maintenance services and the allocation of on-base Living in Accommodation. Staff in Canberra's Head Office are responsible for overseeing strategy, operational programs, corporate governance and corporate support. The Canberra office also includes staff responsible for housing services in this region.

Figure 2

DHA office locations as at 30 June 2023

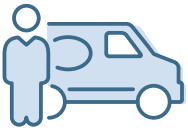


Supply chain

DHA's supply chain comprises of the provision of goods and services that enable us to deliver adequate and suitable housing and housing related services to ADF members and their families. Our procurement activities take place in Australia and are aligned to the Australian Government Commonwealth Procurement Rules.

Most of DHA's contracts with Tier 1¹ suppliers are located in Australia, predominantly provide services rather than goods and their employees are covered by Australia's workplace relations legislation.

In 2022-23, DHA's three main supply chains were:



trades and other services associated with property repairs and maintenance (including end of lease and other cleaning services)



construction and development services



corporate and other contracts, including the provision of information and communications technology goods and services, office cleaning services and corporate uniforms

DHA has identified industries included in its supply chain that represent a higher risk of modern slavery practices. These industries also align with those identified by the Commonwealth as presenting a high risk, for example, cleaning services and corporate uniforms (garments/textiles), construction and ICT hardware.

¹ Tier 1 suppliers refers to those suppliers where DHA has a direct contractual arrangement.

Risks of Modern Slavery Practices

Over the reporting period DHA applied a targeted, risk-based approach, focusing on key areas of known modern slavery risk in its operations and supply chains, in particular the procurement of cleaning, textiles, and ICT hardware, which have the most severe potential impact on people. This targeted approach is consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the recognised global standard for preventing and addressing business-related human rights harm.



Cleaning Services

Risk

DHA procures cleaning services for its office locations during its property repairs and maintenance services. We recognise that cleaning services represents a potential high-risk area, in particular DHA may be exposed to high-risk factors such as use of unskilled contract labour, migrant workers who may be in exploitative situations and underpayment of workers by their contractors.

Response

Where possible to reduce this risk, DHA engages certified indigenous businesses through Supply Nation, engage via contracting mechanisms that include modern slavery obligations on the contractor and assess their governance and policies relating to modern slavery practices during the procurement process via the completion and assessment of the Supplier Modern Slavery Questionnaire.

Textiles

Risk

DHA procures textiles in the form of clothing for uniforms which supports frontline DHA officials in carrying out their duties. We acknowledge that the textiles industry is globally recognised as a high-risk sector for modern slavery, specifically risks of unreasonable work expectations, forced labour practices, unsafe working conditions, and exploitation of women.

Response

DHA undertook a procurement activity in 2022 for the provision of corporate uniforms. Stringent modern slavery evaluation criteria were embedded in the process to allow for thorough consideration of suppliers modern slavery governance and practices, along with strict modern slavery clauses outlining the ongoing obligations for prevention and reporting of modern slavery risks/concerns as part of the contract. Ongoing contract management practices will monitor the contractor's obligations during the contract term.



Construction

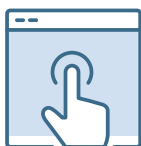
Risk

DHA acknowledges that there are risks associated with its business operations that may contribute to modern slavery practices, for example the highly competitive procurement environment and ambitious scheduling associated within construction projects. The multi-tiered supply chains and high rates of subcontracting common in the property industry can result in little visibility and control over suppliers and subcontractors' recruitment and employment practices, as such it is possible DHA's business operations are exposed to modern slavery practices further down its supply chains.

Response

DHA has deemed the risk for construction labour within its operations to be low due to the strong enforcement of laws within the country, however we acknowledge that the risks may persist due to the use of subcontracting and the way in which this may limit visibility. To mitigate modern slavery risks in our construction projects the supplier's modern slavery governance and corporate structures are assessed during the evaluation process through completion of the Supplier Modern Slavery Questionnaire and standardised contracts with modern slavery and site audit provisions used.

DHA recognises it has further work to do to map its construction suppliers and better understand the extent of its risks so further mitigative action can be taken. DHA is exploring the best way to manage and monitor risks within this sector as part of its future commitments.



ICT Hardware

Risks

For DHA to undertake its functions and operations, the procurement of ICT hardware, including electronic goods such as desktop computers, laptops, phones, networks and servers is essential. Global ICT hardware supply chains are long and complex and present many risk factors including forced overtime, occupational health and safety hazards, child labour, extremely low wages, and restriction on the freedom of movement.

Response

To mitigate potential modern slavery risks when procuring ICT hardware, where possible DHA accesses the Commonwealth Government's Digital Transformation Agency's (DTA) BuyICT platform. The BuyICT platform is an online marketplace that connects government buyers with ICT industry suppliers. The DTA contracting suite has provision of modern slavery clauses and are currently undertaking a program of work to increase awareness of modern slavery in ICT hardware procurement, which includes publication of communication material aimed at buyers and sellers which highlights expectations around the management of modern slavery and supplier awareness sessions to build capability within the sector.

Within this high-risk sector, DHA leverages the modern slavery actions of the DTA, however continues to apply its own measures, including the requirement for completion of the Supplier Modern Slavery Questionnaire to ensure we are undertaking our own due diligence and continue to build our understanding and capability to identify and address evolving risks.

Assessing and Addressing Modern Slavery Risks

DHA's approach to addressing modern slavery risk focuses on understanding potential modern slavery risks, maturing management and governance frameworks, and operationalising business processes to identify potential risks, mitigate and remediate.

In addition to the actions taken across high-risk areas of procurement identified above, DHA deploys a due diligence methodology which is supported by business capability, agency standards and continuous improvement. This approach includes:

Conceptual Risk Framework

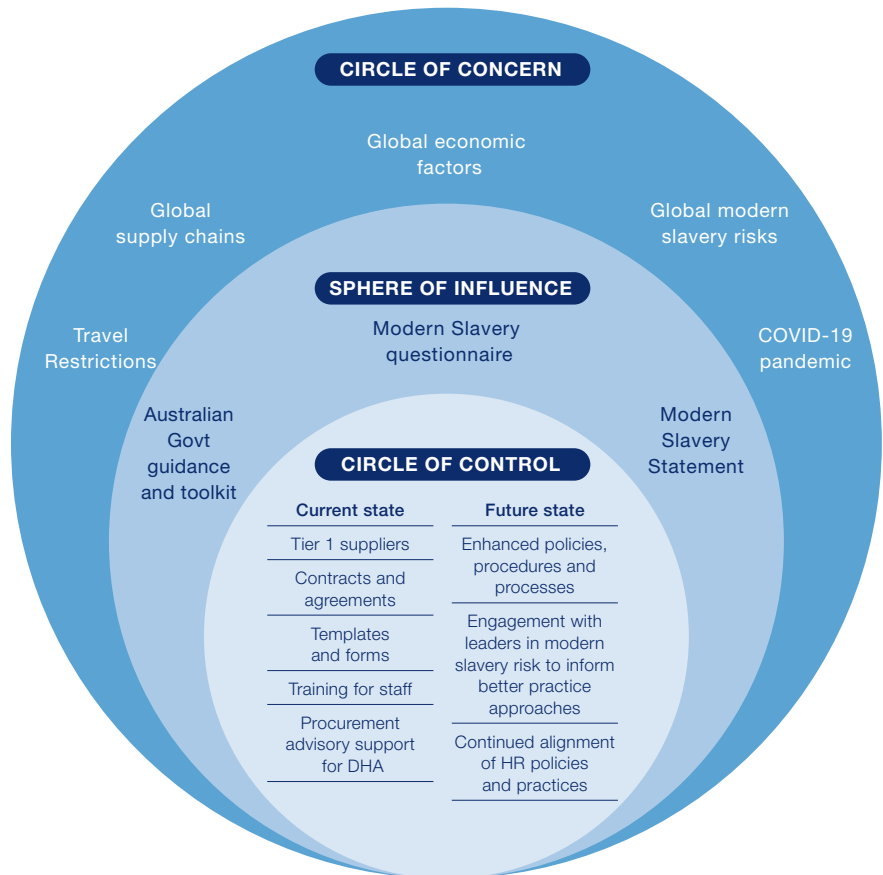
DHA has developed a conceptual modern slavery risk framework (figure 3) to be applied in the assessment of key risks within these four categories. This framework has been built leveraging professional relationships in government, academia, and commercial industries and by developing a better understanding of our level of risk following the analysis of data provided in the Walk Free Foundation Global Slavery Index.

Undertaking risk assessments of key risks specific to DHA construction projects in line with the DHA modern slavery risk assessment framework and developing an action plan

Monitoring compliance and effectiveness of the Modern Slavery Awareness Act eLearning Module

Figure 3

DHA's conceptual framework for understanding and addressing Modern Slavery risks



Governance

DHA's corporate governance structure enables outcomes to be delivered in a controlled, transparent, and accountable manner. The governance framework comprises the principles, practices and tools needed for a consistent and coordinated approach to governance.

The performance framework provides strategic direction and alignment across the organisation through a clear line of sight through all planning and reporting activities, including:

- › coordinated business planning as reflected in the Corporate Plan strategic goals and objectives
- › performance monitoring and reporting through regular reviews of strategic and organisational performance measures.

Procurement

DHA regularly updates its internal procurement advice and policies, building on its Accountable Authority Instructions in relation to procurement and leveraging the Commonwealth Procurement Rules as an appropriate approach to procurement activity.

DHA accesses Commonwealth entities' procurement arrangements where they represent better value for money and pre-existing process rigour, such as the whole of government travel and legal arrangements and the DTA Buy/ICT marketplace. In addition, DHA's standard contract suite utilises similar clauses to that provided within the Australian Government Commonwealth Contract Suite templates and utilises the Australian Government Digital Sourcing Contract templates, making it easier for suppliers to do business with us and leveraging the actions undertaken by the Commonwealth to mitigate modern slavery practices and risks. This approach enables consistency of decision making, documentation and compliance with the PGPA Act and the Modern Slavery Act.

DHA has adopted the standardised contract clauses related to modern slavery as developed by the Australian Government for all contracts and agreements relating to corporate type procurements. However, DHA recognised the increased risk of modern slavery within the construction and repairs and maintenance industries and therefore have developed tailored modern slavery clauses for these contracts and agreements to proactively identify, assess and monitor

modern slavery risks. DHA will continue monitor and refine these clauses (or similar) across our agreement templates into the future where required.

DHA recognises that to have a solid understanding of our supply chains we need to gather data throughout the procurement phase to use this information for risk-based decisions and throughout the contract management stage to increase the maturity of our, and our suppliers understanding of modern slavery risks and preventions. DHA administers the Supplier Modern Slavery Questionnaire as part of tender processes across all procurement activities and it forms part of a mandatory tender response document for participation in DHA procurement activities. The data collected is used to inform supplier profiles, undertake due diligence activities, and inform procurement decisions. As part of further enhancements and refinements to the DHA procurement framework, DHA has commenced building a toolkit which includes guidance and principals for DHA procuring officers to consider when assessing modern slavery risks associated with doing business with potential new suppliers.

Employees' working conditions

All DHA's employees are employed either under the Enterprise Agreement or a Determination made by the Managing Director under the Public Service Act, which meet or exceed the National Employment Standards. This mitigates the risk that employees are being made to work in unfair conditions.

Labour hire working conditions

DHA engages contracts for labour hire through other Commonwealth entities' panel arrangements. All labour hire personnel are engaged under employment contracts that meet the National Employment Standards.

Training and capability development

DHA has a comprehensive training suite, delivered through online eLearning modules, awareness videos and face-to-face tutorials that ensures all employees and contractors are aware of their obligations in regarding code of conduct, ethics and fraud and risk management.

A specific introduction to procurement and contract management eLearning module is available for employees involved in procurement activities on behalf of DHA. This module is being updated as part of a broader update to DHA's procurement framework and the introduction of a procure-to-pay solution and will reflect guidance for assessing modern slavery risks throughout the tender process and evaluation.

In the 2021–22 financial year DHA developed and piloted a standalone online modern slavery training module called Modern Slavery Act Awareness. This training module was rolled out organisation wide as a mandatory component of DHA's learning and development suite in 2022.

Participation is sitting at an 89% completion rate which provides an acceptable margin to account for DHA staff on long term leave, secondments, new starters etc.

Modern Slavery Grievance and Remediation Procedure

This procedure, currently in draft format and undergoing consultation, is due to be published and communicated internally and externally in 2024 reporting period. It will detail the process for individuals to disclose instances of modern slavery incidents or practices, either anonymously or otherwise, through varied mechanisms including a hotline and dedicated mailbox which is monitored daily and will set out the principals and processes DHA will follow in addressing the grievance, the possible formal and informal options for remediation and the investigation processes.

Effectiveness

Senior management in the procurement team are responsible for identifying and implementing actions to improve DHA's management of modern slavery risks. Action is implemented through the Modern Slavery Workplan was developed in 2022-23 and progress status updates are provided to the DHA Leadership Team and DHA Board on an annual basis.

In 2023 DHA commenced work to develop a Performance Review Framework which is aligned to the Australian Government framework to assess the effectiveness of actions taken to address the risk of modern slavery and inform future actions, to ensure we are focussing on tangible and sustainable changes. In 2024 DHA will utilise this framework to undertake an assessment of the strategies and controls currently in place to assess their effectiveness and respond accordingly.

DHA recognises that continuous business improvement will mitigate the risk of modern slavery being present in its supply chains and that assessing the effectiveness of our actions to assess and address modern slavery risks is vital to this process.

DHA continues to review its procurement and contract management frameworks to ensure better practice is employed when engaging suppliers. Updates seek to obtain additional information from potential suppliers through the deployment of the Supplier Modern Slavery Questionnaire which draws out information on their governance structure and policies to identify and mitigate risks. Ongoing review of business practices when participating in procurement contracting processes and ongoing training and awareness through tailored guidance to DHA procuring officers when identifying, assessing, and mitigating modern slavery risks is a focus area for DHA.

Continuing to encourage positive relationships with our suppliers is key in sharing our learning and growing a more equitable society. Given some of our suppliers are required to publish their own Modern Slavery Statements we have an opportunity to work together to identify risks and implement effective elimination strategies.

Consultations

DHA is the sole reporting entity for the purposes of the Act as there were no additional owned or controlled entities during the reporting period.

This Statement was, however, consulted on internally with input from the Procurement Team and circulated to the DHA Leadership Team prior to the review and approval by the DHA Board.

Future Focus

2023–24 and beyond priorities and commitments

DHA is committed to continuously improving our efforts to combat modern slavery. We recognise this requires an ongoing year-on-year commitment to a multifaceted program of work.

In 2023–24 and beyond, DHA will seek to focus on assessment and further improvement of the current controls and strategies to contribute to the eradication of modern slavery through:



The implementation of a Supplier Code of Conduct into our standard procurement contracts ensuring we are setting our expectations for the management of modern slavery risk from the outset of our new supplier arrangements

Implementation and adoption of a Modern Slavery Grievance and Remediation Procedure that includes various avenues for anonymous reporting of modern slavery practices and procedures for investigation and remediation

Refinement and redeployment of the Supplier Modern Slavery Questionnaire which is further tailored to identify potential risks within our high-risk categories, particularly construction

Embedding of governance procedures and controls to consistently undertake the development of the DHA Annual Modern Slavery Statement, including the tracking of commitments and monitoring of actions

Modern Slavery Workplan

To track and progress action on DHA's commitments, a Modern Slavery Workplan has been developed and will be updated annually. Action of commitments commenced in 2020 and continue through each reporting period. New actions will be included as they are identified, and status updates recorded for all commitments.

The Workplan provides DHA a pragmatic approach to strengthening modern slavery risk management and governance processes and builds on previous actions which aimed to further DHA's understanding and capability in managing modern slavery risks in its operations and supply chains.

#	Workplan action/commitment	Status			
		Complete	Ongoing	In Progress	New future commitment
1	Examination of its supply chain elements with potential risk.	●			
2	Partnering with leading organisations to ensure rapid advance to maturity of approach	●			
3	Obtaining additional information from potential suppliers of goods and services to DHA about their modern slavery risks and preventative business practices for consideration in procurement decisions	●			
4	Review its procurement and contract management frameworks to ensure better practice is employed when engaging suppliers	●			
5	Specific introduction to procurement and contract management eLearning modules developed for employee involved in procurement activities on behalf of DHA, to be updated for modern slavery requirements and considerations			●	
6	Online modern slavery training module	●			
7	Further strengthening its procurement and contract management frameworks through the creation of a Modern Slavery toolkit for officials undertaking procurement activities, including a Modern Slavery Risk Screening Tool			●	
8	Full deployment of the Modern Slavery Supplier Questionnaire for future suppliers/service providers to obtain information about their modern slavery risks and preventative business practices for consideration in procurement decisions	●			
9	Development of a Performance Framework to assess the effectiveness of our actions taken to address the risk of modern slavery and inform future actions, to ensure we are focussing on tangible and sustainable changes			●	

#	Workplan action/commitment	Status			
		Complete	Ongoing	In Progress	New future commitment
10	Undertaking an assessment of DHA's strategies and controls in line with the DHA Performance Framework			●	
11	Strengthening the strategies and controls following performance assessments		●		
12	Undertaking in-depth review of key risks specific to DHA construction projects and developing an action plan			●	
13	Monitoring compliance and effectiveness of the Modern Slavery Awareness Act eLearning Module		●		
14	Building controls within the future Procure-to-Pay solution to enable better reporting and identification of potential risks			●	
15	Varying existing contracts (if executed prior to the adoption of the standard Modern Slavery contract clauses) that are valued over \$250,000 and considered high risk			●	
16	Engaging with existing high-risk suppliers to undertake the Modern Slavery Supplier Questionnaire if they have not already done so			●	
17	Implementation of a Supplier Code of Conduct into our standard procurement contracts				●
18	Development and adoption of a Modern Slavery Grievance and Remediation Procedure				●
19	Refinement and redeployment of the Supplier Modern Slavery Questionnaire				●
20	Embedding of governance procedures and controls to consistently undertake the development of the DHA Annual Modern Slavery Statement, including the tracking of commitments and monitoring of actions				●