



Voluntary Modern Slavery Risk Statement

Financial Year Ended 30 June 2022

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REPORTING ENTITY

STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

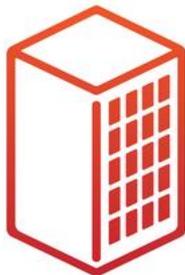
Be Slavery Free is the business name of STOP THE TRAFFIK (ABN 33 160 723 348 registered in 2012). STOP THE TRAFFIK was the first charity registered with the Australian Charities and Not for Profit Commission and that registration continues. STOP THE TRAFFIK operates the STOP THE TRAFFIK Public Fund and donations by individuals to that fund have Deductible 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 Affiliation
- **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



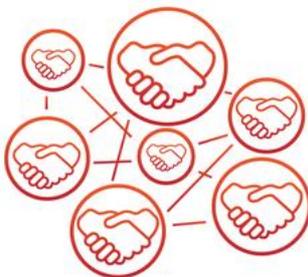
CONSUMERS

- **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

- **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



CIVIL SOCIETY

- **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 400 t-shirts for our shop, to sell and to gift. 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, Darrell Lea 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. This financial year, no international travel was undertaken by any contractors for work with Be Slavery Free. However, 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

Through registration with the Department of Foreign Affairs and Trade 'Smart Traveller' program and additional contact with local consulates and embassies, and national authorities as necessary

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: CHOCOLATE SCORECARD¹

Cocoa is among the most destructive crops in the world, linked to environmental destruction and human exploitation in Africa, Latin America and Southeast Asia.

Today, 1.56 million² children are thought to be working in in West African cocoa growing. Average income for cocoa farmers in Ghana and Côte d'Ivoire, which together produce around two thirds of the world's cocoa, continues at less than \$1 a day.

Since 2014, Be Slavery Free engaged in assessing certification standards, programs of chocolate companies, processors and suppliers in their success in addressing human rights abuses in the cocoa supply chain including child labour, forced labour, human trafficking and extreme poverty.

Over the years it evolved into what we now know as the Chocolate Scorecard, combining the efforts of several scorecards that were focusing on environmental impacts of the cocoa industry, with Be Slavery Free becoming the lead organisation in the project. The Chocolate Scorecard has become a platform for direct engagement with the world's largest cocoa producers and their customers, including the most popular and well-known chocolate brands on environmental, due diligence and human rights issues.



¹ <https://www.chocolatescorecard.com/>

² <https://www.norc.org/Research/Projects/Pages/assessing-progress-in-reducing-child-labor-in-cocoa-growing-areas-of-côte-d'ivoire-and-ghana.aspx>

It is an engagement tool **to bring together the combined expertise with consumer and business networks to produce the Chocolate Scorecard which**

- a. resources consumers to make decisions about their chocolate consumption;
- b. drives change in the cocoa/chocolate industry; and
- c. helps chocolate companies to understand the emerging practices to address social and environmental issues in their value chains relating to cocoa.

In 2022 we made the following improvements:

- Increased the number of companies scored to 38, covering more than 85% of the industry;
- Deepened and improved the relationship with almost all chocolate companies scored such that there is now extensive engagement with nearly all companies before, during and after scoring, to help them know how to improve and address the environmental and human rights issues in their supply chains;
- The questionnaire content and platform was improved largely through a 5 year research agreement with Macquarie University (Australia), University of Wollongong (Australia) and Open University London (UK). This increased the academic standing of our report, and provided a questionnaire platform which is simpler to use, privacy and security of data in accordance with University storage protocols, an external grievance process and an approval from the three Universities involved for the Human Research Ethics Committee guidelines being followed with the research³;
- In addition to the University engagement, eight subject matter experts were involved in shaping the questions and undertaking the scoring;
- 20 Civil society partners were engaged in the distribution of the scorecard through their networks for Europe to the Americas, Africa to the Asia Pacific;
- An extensive methodology was produced and made public for companies and consumers;
- Key documents were produced in English, Japanese and French and the Chocolate Scorecard itself in 11 languages.

Change has begun to come to the world's cocoa industry - producer countries, consumer countries, and major chocolate/cocoa companies have begun to acknowledge and address the environmental cost of this delicious treat, as well as human rights issues in cocoa. We are proud that the Chocolate Scorecard has played a role in that change and look forward to increasing its impact in the coming years.

³ This research has been conducted in accordance with Human Research Ethics Committee guidelines under the project titled The Chocolate Scorecard

- Project ID 10917, 2022, from Macquarie University, Sydney, Australia;
- Open University (UK) HREC/4275/Bernardi;
- University of Wollongong HREC, project title: Chocolate Scorecard, number: 2022/009.

APPROVAL BY BOARD

Approved by the Be Slavery Free Board on 14 December 2022.

A handwritten signature in black ink, appearing to read 'Nick Dexter', with a small dot at the end.

Nick Dexter

Interim Chair of the Board of Directors

Be Slavery Free

Date : 14 December, 2022