

Treasury Corporation of Victoria

Modern Slavery Statement 2024



Cover image: Melbourne Tram on Collins Street
Source: Department of Jobs, Skills, Industry and Regions / Lynton Crabb Photography

Treasury Corporation of Victoria
Level 29, North Tower
80 Collins Street
Melbourne Victoria 3000
Australia

Telephone: (03) 9651 4800
Website: www.tcv.vic.gov.au

Authorised by the Victorian Government
1 Treasury Place, Melbourne, 3002

© State of Victoria (Treasury Corporation of Victoria) 2024



This work, the Treasury Corporation of Victoria Modern Slavery Statement 2024, is licensed under a Creative Commons Attribution 4.0 licence. You are free to re-use the work under that licence on the condition that you credit the State of Victoria (Treasury Corporation of Victoria) as author. The licence does not apply to any images, photographs or branding, including the Treasury Corporation of Victoria logo.

Published 2024

Acknowledgement of Country

TCV respectfully acknowledges the Traditional Custodians of Country throughout Victoria and recognises and respects their continuing cultural heritage, beliefs and connection to land. We pay our respects to their Elders past and present.



Introduction

This modern slavery statement (this statement) is made by Treasury Corporation of Victoria (ABN 97 552 308 966) (TCV). References to 'our' and 'we' in this statement are references to TCV.

This statement sets out the information required by the *Modern Slavery Act 2018* (Cth) (the Act), in accordance with section 13 of the Act. It describes the risks of modern slavery in our business and actions we have taken to address those risks during the reporting period 1 July 2023 – 30 June 2024 (FY24).

Our purpose and mission

TCV's purpose is a better future for Victoria.

TCV is established by the *Treasury Corporation of Victoria Act 1992* (the TCV Act) as the central financial institution for the State of Victoria (the State) and participating authorities.

TCV's mission – enshrined in our founding legislation – is to provide financial services and manage risk to benefit the State and our clients.

We source capital and manage risks across the full breadth of the Victorian public sector. Our clients include all Government departments via the Department of Treasury and Finance (DTF), local councils and water corporations. We also support enterprises in the housing, arts, sports, entertainment, transport, commercial and industrial real estate, infrastructure, technology and healthcare sectors.

We contribute funding and support investment to build housing, schools and hospitals, to maintain and upgrade roads and public transport systems, and the State's water infrastructure. We also provide financing and support investment to achieve Victoria's climate action, energy transition and sustainability goals.

In these and many other ways, we have the opportunity and responsibility to achieve a lasting positive impact for our community.

We provide financial services and manage risk to benefit the State and our clients.

We add value and support the financial stability and resilience of the State and our clients by centrally managing funding, liquidity and interest rate risks for the Victorian public sector.

By consolidating the management of these risks, we are able to achieve economies of scale, establish and maintain a risk governance and management framework, employ a team of highly skilled specialists, and deliver outcomes more effectively and competitively than if these tasks were undertaken by the State or our clients directly.

In practice, this means:

- We raise capital in the wholesale financial markets to provide funding to the State and our clients.
- We act as the face of the State to financial markets, showcasing Victoria to the domestic and international investor community.
- We support our clients and help them achieve their goals. We do this by understanding their needs and providing expert advice on funding, liquidity management, financial risk management, business plan development, economics and financial market conditions.
- We support a liquid market in TCV securities through the flexible and proactive management of our funding program in collaboration with our dealer panel. This enables us to provide investors with efficient access to high quality liquid investments.

Our values

TCV's values define how we embrace our purpose and mission

TCV's values shape our culture and establish the expectations that we have for each other, and that our clients, stakeholders, and suppliers should have for us.

We care	About each other, our clients, interactions and communities
We make a difference	We add value, are proactive and do the right thing
We deliver	To a high standard, reliably, efficiently, and on our commitments
We achieve together	We contribute, collaborate and embrace diversity

We care because our purpose matters and our business is based on relationships.

We make a difference because, while financial performance is a critical prerequisite, our success is defined by the broader impact we have.

We deliver because our clients and stakeholders trust us to help them achieve their goals, and the risks we manage are significant for the State and our clients.

We achieve together because everything we accomplish is done with the collaboration and support of others.

TCV understands the importance of both its role in the Australian financial markets, and the need to uphold responsible and ethical conduct. TCV promotes the public sector values, which underpin our operations.



Responsiveness



Integrity



Impartiality



Accountability



Respect



Leadership



Human Rights

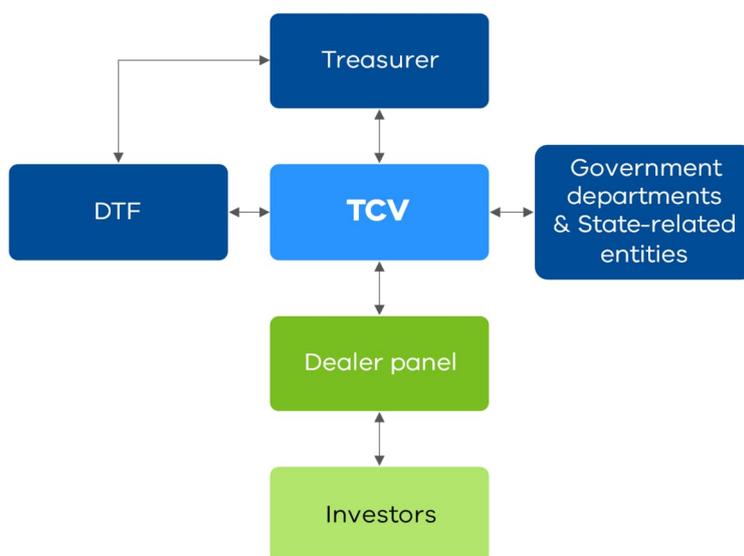
Our structure, operations and supply chains

Our structure

TCV is a statutory corporation established by the TCV Act. TCV is the central financial institution for the State and participating authorities.

The Treasurer of the State is our stakeholder and sole shareholder. DTF monitors the Treasurer's interests. TCV's Chair reports directly to the Treasurer, on behalf of our Board of Directors (the Board).

In the exercise of its powers and performance of its functions under the TCV Act, TCV is subject to the general direction, control and specific approvals, requests, and determinations of the Treasurer.



TCV does not own or control any other entities.

As at 30 June 2024 TCV employed 56 employees, all based in our headquarters in Melbourne, Victoria. TCV operates solely in the State of Victoria, Australia.

Our operations

TCV provides treasury services to the State and participating authorities.

The TCV Act only enables TCV to provide products and services to clients who comprise “participating authorities” (public authorities accepted by TCV) and Departments of the State and, at the determination of the Treasurer, other entities. At 30 June 2024, there were 161 Participating Authorities.

The treasury services we provide include:

- debt portfolio management
- cash management and deposit products
- interest rate, foreign exchange and commodity risk management
- economic research services
- financing policies and strategies
- dedicated financing services
- general treasury and financing advice
- analytical services.

We also provide these services to other Victorian entities at the request of the Treasurer.

Our key operations

Direct employment of workers Our employees are mainly professional staff, based in our Melbourne office, who include financial advisors, bankers, client relationship managers as well as legal, IT, human resources and other support functions.

Loans and financing services TCV's range of loan facilities includes:

- short-term loans
- term floating rate note loans
- fixed rate loans
- flexible rate set term loans
- forward settlement loans.

All our loans are made to the State or are guaranteed by the State.

Risk management services We provide risk management services to our clients. This includes the provision of hedging advice and financial risk management arrangements using various interest rate, foreign exchange and commodity derivative products.

Advisory services We provide financial advisory services to our clients, including:

- advising on financing, debt portfolio structure and financial risk management
 - business case development and/or financial modelling services
 - contract management services to departments and agencies required to manage public-private partnerships and other financial related contracts
 - advising on economic issues and developments, delivering economic and financial market insights.
-

Borrowing programs TCV maintains a range of borrowing programs to facilitate access to long and short-term funding in domestic and international debt capital markets which allow us to access a diverse investor base. Our active management of these programs allows TCV to source funds at competitive pricing even in challenging market conditions.

We finance the provision of loans by issuing Victorian Government-guaranteed debt. Our payment obligations in relation to borrowings and derivative transactions are guaranteed by the State (section 32 of the TCV Act).

Investment services TCV offers investment facilities to assist the State and its statutory authorities and government business enterprises with their cash management activities. These include:

- 11am cash deposits
 - term deposits
 - fixed interest deposits
 - term floating rate deposits
 - structured deposits.
-

TCV supports the State and its agencies and departments by assisting in the management of their financial risks. TCV works to understand each organisations' specific financing, investment and market risks, and provide the appropriate products, services and advice to manage these risks.

Our supply chain

Our business is primarily service / office-based, with the main supplier industries in our broader supply chain comprising:

- debt capital markets dealer and broker services
- bond registry services
- banking and settlement services
- market data services
- software, hardware, cloud and telecommunications products and services
- internal audit services
- accounting services
- insurance and insurance broking services
- legal services
- recruitment, training and development and other employee related services
- facilities management
- cleaning
- office services
- domestic and international travel services.

TCV has a transparent procurement process for suppliers which is compliant with Victorian Government Purchasing Board (VGPB) Policies available at: <https://www.buyingfor.vic.gov.au/governance-goods-and-services-policy>.

Procurement may be conducted through Victorian government portals such as the Buying for Victoria website or via direct invitation to identified vendors.

Contracts awarded for the procurement of goods or services above \$100,000 are uploaded to the Buying for Victoria website. This is discussed further below under 'Due diligence and supplier engagement'.

TCV's broader supply chain is a complex process and we are continually reassessing our direct and indirect supply chains to enable us to better understand source countries and other factors which may impact on modern slavery risks.

Modern slavery risks in supply chain and operations

TCV is committed to responsible supply chain management, in line with the public service value of protecting human rights. To support this commitment, TCV put in place a third-party risk management platform to assist with due diligence and screening services, and ongoing monitoring of, our current (and prospective) supplier network. This enables us to assess our exposure to the risk of modern slavery and assist with the management of any risks exposed.

Modern slavery risks in our supply chain

TCV has the potential to be directly linked to modern slavery through its supplier relationships and other third-party relationships. Our supply chain's exposure to the following areas is considered 'higher risk' for modern slavery:

- global financial services providers
- IT equipment (including base materials, batteries and manufacturing)
- IT services (including labour used by our IT suppliers)
- cloud services
- facilities management (including cleaning, maintenance and security)
- outsourced labour services used by our suppliers (including call centres and data processing)
- travel, accommodation and hospitality services used by our workforce.

In FY24 we used a third-party risk management platform to aggregate data from various sources and prepare due diligence reports on our entire supplier network. The sources used for these reports are broad and analysis on a supplier extends to associated companies and individuals. The sources used include international sanctions and enforcement watchlists (over 400) and adverse media and political exposure and focuses on (amongst other things):

- (i) any connection with politically exposed persons;
- (ii) evidence of corruption, terrorism, trafficking and exposure to conflict minerals;
- (iii) environmental crime; and
- (iv) human rights violations.

The overwhelming majority of the 239 reports generated came back with a "No risk alert" rating. Those reports that initially returned with a "Risk alert" rating have subsequently been "remediated" (via additional and ongoing due diligence) and have reverted to a "No risk alert" rating.

As mentioned above, monitoring is ongoing, and we continue to assess our supply chain and manage any potential modern slavery risk from proposed or new suppliers.

Modern slavery risks in our operations

Given the skilled nature of TCV's workers, and the level of transparency and oversight TCV has over its direct workforce, TCV considers there is a relatively low risk of causing or contributing to modern slavery in its immediate operations.

TCV does however have the potential to be indirectly linked to modern slavery through its financing and investing activities. For example, the provision of financing or investment to TCV's clients on behalf of the State for the purposes of infrastructure and other development projects may carry inherent risks related to the raw materials and use of labour related to those projects.

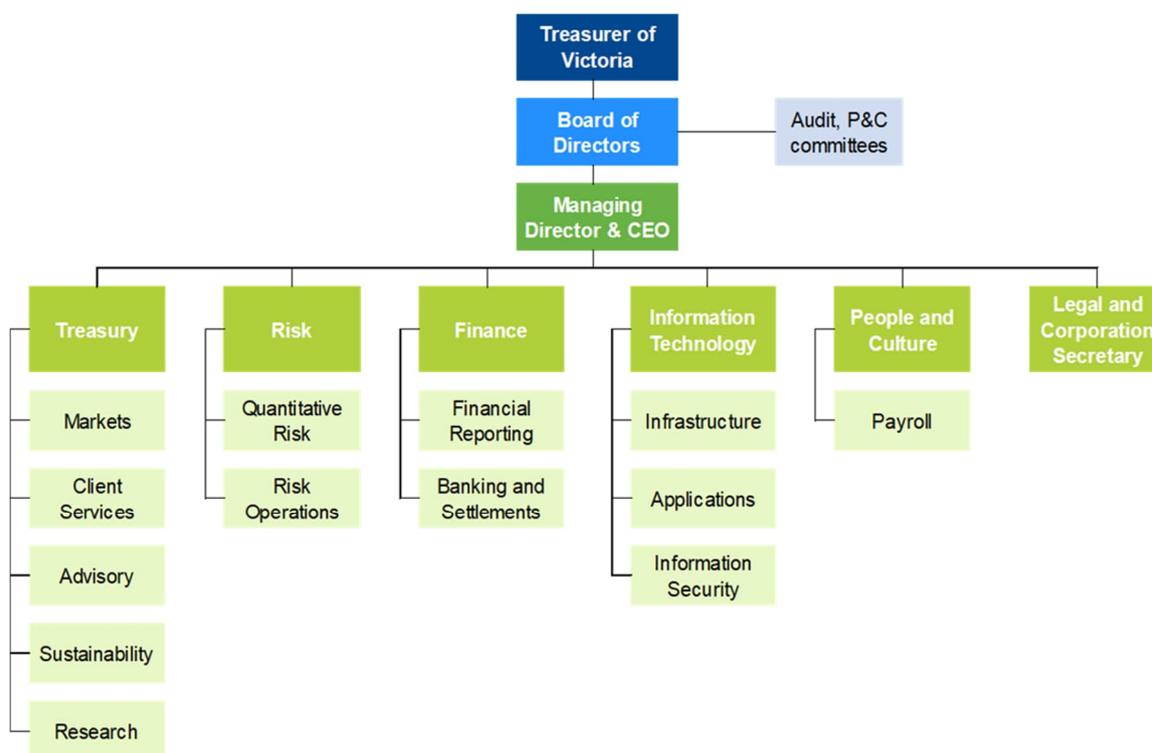
The overwhelming majority of TCV's financing and investment activities are to government (and governmental) entities that are subject to standards of conduct, probity and risk management imposed by the State. As such, we are somewhat reliant on the governmental entities to impose these standards. That said, our Modern Slavery Policy requires all TCV employees to encourage suppliers and clients to report any modern slavery risk to us and to identify and mitigate any modern slavery risk.

Additionally, TCV seeks to directly identify, mitigate and manage the risk it might reasonably face in providing products and services. This includes consideration of money laundering and terrorist financing risk exposures which, given the interrelationship between modern slavery and money laundering, allows TCV to draw on analysis of TCV's business relationships, the methods used to deliver products and services, the foreign jurisdictions in which TCV deals and suspicious matter reporting.

Actions taken to assess and address modern slavery risks

Governance

During FY24, TCV had the following governance and organisational structure:



Policies and procedures

In FY24, the Board approved TCV's first Modern Slavery Policy. The purpose of which is to:

- support the compliance of TCV with applicable national, local and other applicable laws and regulations regarding modern slavery, including requirements of the Act

- set out how TCV will address risks associated with modern slavery in its operations and supply chain
- set minimum standards and expectations for TCV's Employees regarding identifying, assessing and addressing modern slavery risks.

TCV's Modern Slavery Policy is to be read in conjunction with the policies and procedures set out below, that are in place to promote human rights and reduce the risks associated with modern slavery in our operations. These include policies that apply across the Victorian Government public service.

TCV is bound by and must comply with relevant Victorian Government standards, which include the policies of the VGPB. VGPB policies are mandated under the *Financial Management Act 1994* (Vic) and are subject to Standing Directions issued by DTF. They cover:

- Governance
- Complexity and capability assessment
- Market analysis and review
- Market approach
- Contract management and disclosure.

A combination of the following policies is incorporated into our Expenditure and Procurement Policy and Procedure and our Modern Slavery Policy which, together, enunciate TCV's procedure for the incurrence of expenditure and the processing of invoices. These provide an overarching framework that encompasses:

Supplier Code of Conduct

This sets out minimum expectations for suppliers including in relation to labour and human rights and health and safety of workers. This Supplier Code of Conduct applies to all entities that supply goods or services to Victoria, including to TCV, and suppliers are expected to communicate the code to their related entities, suppliers and subcontractors. Under the Supplier Code of Conduct, suppliers are expected to:

- report concerns about non-compliance with the Code
- provide goods and services in a manner consistent with any applicable human rights obligations
- proactively identify, address and, where required by legislation, report on risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices) in their business operations and supply chains
- ensure all work is undertaken without coercion
- not use any form of forced, bonded or indentured labour
- employ only workers who are the applicable minimum legal age.

Suppliers acknowledge the Supplier Code of Conduct by completing and returning the commitment letter acknowledging the minimum expectations confirming they will aspire to meet those expectations. The commitment letter is available at <https://www.buyingfor.vic.gov.au/how-implement-supplier-code-conduct-buyers>.

Probity in Procurement Guidelines

TCV must follow these Guidelines when procuring goods and services so that it upholds the highest standards of probity and integrity, and that procurement decisions are made in an ethical way following good processes. These Guidelines support TCV to build a procurement culture that demonstrates high standards of probity, including by implementing open and transparent procurement processes and highlighting and actively promoting ethical values. The Guidelines require implementing processes and actions that are consistent, accountable, transparent and auditable, good record keeping, maintaining an audit trail, equity in decision making, clear, honest communication, independent checks and approvals that can identify probity issues, security and confidentiality of information and identifying and managing conflicts of interest whether actual, perceived or potential.

Victoria's Social Procurement Framework

TCV is encouraged to seek opportunities where available to directly or indirectly procure from social enterprises, Australian Disability Enterprises or Aboriginal businesses. All procurements that support these objects are recorded in a register.

Additional key policies include:

Code of Conduct for Victorian Public Sector Employees

This Code of Conduct sets out the standards of behaviour expected of Victorian Public Sector Employees in the performance of their employment obligations and duties. The Code of Conduct includes obligations for employees to report unethical behaviour, make decisions that consider and respect human rights, deliver services and programs consistent with human rights, and raise concerns where there are circumstances that could breach those rights. The Code is publicly available online.

Anti-Money Laundering and Counter Terrorism Financing Policy

This policy establishes the broad parameters and approach TCV uses to identify, mitigate and manage the risk that TCV might reasonably face through its provision of products and services which might involve or facilitate money laundering or terrorist financing.

TCV Internal Complaint Procedure

TCV is committed to providing a fair and impartial process for the resolution of work-related complaints and grievances, particularly those that may involve unlawful discrimination, harassment or bullying. The procedure provides a grievance procedure for employees who are affected by these kinds of behaviour. In particular it sets out the procedures for dealing effectively with grievances, as an important step in preventing and reducing workplace stress and minimising risks to health.

Occupational Health and Safety Manual

The Manual sets out the key policies and procedures for TCV workers, contractors, customers and visitors and includes:

- Health and Safety Policy
- Bullying, Discrimination and Harassment Prevention Policy
- Fitness for Work Policy
- Alcohol at TCV / Client Functions
- Health and Safety Accountability and Responsibilities
- Health and Safety Legal Obligations
- Hazard and Risk Management
- Emergency Management Procedure
- Contractor and Visitor Management Procedure.

The Manual sets out TCV's commitment to a workplace that supports equal employment opportunities and is a healthy, safe, welcoming place to work. TCV is committed to achieving a high level of occupational health and safety performance, whilst providing the safest possible working environment for all workers, contractors, members of the public and interested parties.

Public Interest Disclosures Procedures

The Procedures set out the processes that facilitate employees and other persons to make disclosures of improper conduct by public bodies or public sector employees, and protects people who report improper conduct from reprisal. TCV recognises the value of transparency and accountability in its administrative and management practices and supports the making of disclosures revealing improper conduct and will take all reasonable steps to protect people making disclosures from reprisals. We are also committed to affording natural justice to the person subject of the disclosure. These Procedures are made publicly available on TCV's website.

TCV Contract Management Strategy

Our contract management strategy defines how procurement categories and individual procurements will be managed at the contractual stage based on their complexity.

Due diligence and supplier engagement

In addition to our due diligence, screening and ongoing monitoring provided through our third-party risk management platform, TCV undertakes due diligence as part of its contracting of suppliers and its procurement processes, as well as its investment decision-making, which also supports TCV's efforts to reduce the risks of modern slavery in its operations and supply chain.

TCV has a transparent procurement process for suppliers which complies with VGPB Policies. The VGPB policy is available at: <https://www.buyingfor.vic.gov.au/governance-goods-and-services-policy>.

We follow our Expenditure and Procurement Policy and Procedure outlined above. This includes the Chief Procurement Officer preparing an annual 'supplier engagement plan' that documents the processes, systems and communication approaches put in place to ensure the highest levels of trust and accountability in all dealings with suppliers.

Under this policy, a procurement of goods or services is not to progress past market analysis without first confirming whether the good or service is covered by a mandatory State Purchase Contract. It is also recommended that where relevant, non-mandatory State Purchase Contracts be considered. Where the use of a State Purchase Contract is mandatory, the procurement must be undertaken utilising the relevant process and suppliers. If this is not preferred, an exemption from the State Purchase Contract must be applied for and granted.

Contracts awarded for the procurement of goods or services above \$100,000 are uploaded to the Buying for Victoria website. To encourage suppliers to improve workplace gender equality, all requests for quote/tenders are required to require suppliers to provide details that enable an assessment of their business actions and support for gender equality.

The alignment of TCV's due diligence and supplier engagement with VGPB policies provides TCV with a framework around supplier engagement which substantially improves TCV's confidence in the integrity of such appointments including, but not limited to, its ability to assess modern slavery risks.

Training

In FY24, TCV engaged an external expert to develop and provide specific modern slavery training for all employees. Any new employees will be required to complete this training. In addition to this, TCV conducts regular training for employees which covers the Charter of Human Rights, Anti-Money Laundering, the Code of Conduct for Victorian Public Sector Employees, OH&S issues, and key risk and compliance areas, which also encompasses different aspects of training on modern slavery issues.

Raising grievances and seeking remediation

TCV has processes in place to support employees, suppliers, and other persons to report improper conduct or raise complaints.

Under the *Public Interest Disclosures Act 2012 (Vic)* (the PID Act), TCV is not able to receive disclosure regarding improper conduct by its employees, officers or directors. Any such disclosures are required to be made to the Independent Broad-based Anti-Corruption Commission (IBAC) or investigating entities if the discloser wishes the disclosure to be protected under the PID Act.

TCV has established procedures to:

- make employees and other persons aware that they can make disclosures under the PID Act directly to IBAC
- keep a discloser's identity and the content of a disclosure confidential
- manage the welfare of disclosers including protecting them from detrimental action.

These procedures are publicly available on TCV's website. Employees can make disclosures to IBAC regarding risks to the health or safety of a person or other improper conduct or detrimental action, including modern slavery concerns.

TCV's Procurement Complaints Management Policy sets out the process and procedures for addressing supplier complaints. The Chief Procurement Officer is responsible for the policy's drafting, annual review and publication of a summary on the TCV website. Under this Policy suppliers can lodge a procurement complaint with TCV if they have an issue or concern in relation to the process and probity applied by TCV when carrying out a procurement activity. TCV has established a complaints management process to ensure all procurement complaints are investigated and, where appropriate or possible, remedied. If the complainant disagrees with the outcome of their complaint, they may refer the complaint to the VGPB for review.

When TCV receives disclosures under the PID Act or procurement complaints, it has processes in place to remediate the issue, where possible and appropriate.

Measuring the effectiveness of actions taken

TCV is at an early stage of assessing the effectiveness of our actions to address modern slavery risks. TCV's focus during the reporting period was deepening its understanding of these issues and then implementing, what we see as crucial processes to ensure that risks are mitigated.

TCV is continually assessing the effectiveness of the measures we undertake to address modern slavery risks. This is a key focus area for us as we start to develop frameworks and processes to ensure the effectiveness of our actions.

Consultation

This criterion does not apply to TCV as we do not own or control any other entities.

In preparing this statement, we have consulted with relevant internal teams across the organisation.

Approval

This statement was approved by the Board in its capacity as principal governing body of Treasury Corporation of Victoria on 17 December 2024.

This statement is signed by Cassandra Kelly (below) in her capacity as Chair of the Board of Treasury Corporation of Victoria.

Signed

A handwritten signature in black ink that reads "Cassandra Kelly". The signature is written in a cursive style with a large initial 'C' and a distinct 'K'.

Cassandra Kelly

Chair, Treasury Corporation of Victoria

17 December 2024

Contacts

Address	Level 29, North Tower, 80 Collins Street, Melbourne, Victoria, 3000	
Internet	www.tcv.vic.gov.au	
Email	tcv@tcv.vic.gov.au	
Telephone	+61 3 9651 4800	General
	+61 3 9911 3636	Dealing room
	+61 3 9651 4843	Settlements
Facsimile	+61 3 9651 4880	General
	+61 3 9651 4880	Dealing room
	+61 3 9651 4899	Settlements
Registry of Inscribed Stock	Inscribed stock registries are operated by Computershare Investor Services Pty Ltd, located at: Yarra Falls, 452 Johnston Street, Abbotsford, Victoria, 3067 Telephone: +61 3 9415 5000 Facsimile: +61 3 9473 2535.	
Government Bonds of Victoria	Freecall number 1800 628 008	
Designated Investment Bonds	For information on Designated Investment Bonds issued under the Australian Department of Immigration and Border Protection, please email tcv@tcv.vic.gov.au or telephone +61 3 9911 3636.	



1