

MODERN SLAVERY STATEMENT







Australian Sports Commission Acknowledgement of Country

The Australian Sports Commission (ASC) acknowledges the Traditional Custodians of the lands where its offices are located, the Ngunnawal people and recognise any other people or families with connection to the lands of the ACT and region, the Wurundjeri Woi-wurrung people of the Kulin Nation, the people of the Yugambeh Nation and the Gadigal people of the Eora Nation.

The ASC extends this acknowledgment to all the Traditional Custodians of the lands and First Nations Peoples throughout Australia and would like to pay its respects to all Elders past, present and future.

The ASC recognises the outstanding contribution that Aboriginal and Torres Strait Islander peoples make to society and sport in Australia and celebrates the power of sport to promote reconciliation and reduce inequality.

Contents

Foreword		
Introduction	5	
Our Organisation	5	
Identification of the Reporting Entity		
Our Operations		
Risk of Modern Slavery Practices	8	
Current Actions to Address Modern Slavery Risks	9	
Additional Actions to Address Modern Slavery Risks		
Effectiveness of our Actions		

Foreword

The Australian Sports Commission (ASC) envisions a nation where sport is accessible to every Australian, fostering achievements that inspire national pride. This vision is realised by prioritising the creation of safe and enjoyable sporting environments, from grassroots level through to the pinnacle of elite international competition.

The Australian Government remains at the forefront of the fight against modern slavery, a hidden yet pervasive human rights violation affecting all sectors and industries. We recognise that eliminating such exploitation requires a collective, sustained effort. Our commitment to this cause is integral to the values that underpin Australian sport: fairness, respect, and integrity. These values drive us to ensure that our organisation, our partners, and our suppliers operate in ways that respect human dignity.

Our primary focus is on establishing a strong foundation to address modern slavery risks and developing strategies to prevent slavery and human trafficking within our operations and supply chains. We will continue to raise awareness of modern slavery across the sport sector and support the efforts of our industry peers.

With this commitment, I am pleased to present the ASC's fifth Modern Slavery Statement (Statement), approved by the ASC's Chair of the Board of Commissioners. This Statement reflects the progress we've made and outlines the ongoing actions we are taking to reduce risks and support human rights in every area of our operations. I am grateful for the commitment of our staff, partners, and suppliers, and I am confident that, as a collective, we are making strides toward a future where modern slavery has no place in sport or society.

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Kate Jenkins AO ASC Board Chair

Introduction

This Modern Slavery Statement (Statement) is prepared by the Australian Sports Commission (ASC) in accordance with section 13 of the *Modern Slavery Act 2018* and guided by the mandatory criteria under section 16. This Statement covers the period 1 July 2023 and 30 June 2024.

In this statement, we affirm our commitment to addressing modern slavery risks within our operations and supply chains, acknowledging that this is essential to our role as a leader in Australian sport. We have focused on building relationships across our supply chains, fostering collaboration, and implementing policies and practices to ensure that those contributing to Australia's sporting achievements do so in fair and safe environments.

Our Organisation

This section details content to satisfy mandatory criteria 1(a), 1(b) and 1(f) under section 16 of the Act, including identification of the reporting entity, a description of its structure, operations and supply chains and a description of the process of consultation in the development of the Statement with any entities owned or controlled.

Identification of the Reporting Entity

The Australian Sports Commission (ASC) is the Australian Government agency dedicated to supporting and investing in sport. It was established in 1985 under the *Australian Sports Commission Act 1989* (ASC Act) and operates in accordance with the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).

As a corporate Commonwealth entity, the ASC is funded by the Australian Government to support and invest in sport at all levels. The ASC is governed by a Board of Commissioners appointed by, and accountable to, the Minister for Sport. The Board determines the ASC's overall direction, decides on the allocation of resources and policy for delegated decisions.

The ASC is administered from Canberra at the Australian Institute of Sport (AIS) Bruce campus and has offices in Melbourne and Sydney. The ASC workforce is employed under the Australian Sports Commission Enterprise Agreement and comes from a broad range of backgrounds, including former athletes, coaches, officials, sports administrators and subject matter experts from the public and private sectors.

To address mandatory criteria 1(f) under section 16 of the Act. The ASC does not own or control any other entities and is therefore not required to provide description of the process of consultation in the development of the Statement with any entities owned or controlled.

You can learn more about the ASC by visiting ausport.gov.au.

Our Operations

The ASC plays a vital role in to promoting, supporting, and developing sport at all levels across Australia. Our primary mission is to increase participation in sports among Australians of all ages and abilities, while advancing Australia's global standing in the high-performance sports sector. We achieve this through strategic funding support and the operation of the Australian Institute of Sport (AIS) campus.

To achieve this purpose, our 2023–24 strategy was centred around three strategic goals:



LEAD AND ENABLE THE WORLD'S BEST SPORT SYSTEM



INVOLVE MORE AUSTRALIANS WITH SPORT AT ALL LEVELS



DRIVE INNOVATION IN SPORT

Our operations are diverse, encompassing the funding, administration, and strategic direction of sports initiatives that drive participation, enhance talent pathways, and support elite performance. We work closely with a range of partners, including national sporting organisations (NSOs), national sporting organisations for people with disability (NSODs), and the National Institute Network. Additionally, we collaborate with high-performance Games partners, such as the Australian Olympic Committee, Paralympics Australia, and Commonwealth Games Australia, to support Australia's athletes on the world stage.

In carrying out these responsibilities, the ASC manages and allocates various grants programs to support high performance and national sports participation programs, performance pathways, people development, well-being initiatives, and research and innovation. In addition, we provide individualised support to numerous athletes and collaborate closely with dozens of Australian sports, offering guidance and assistance.

The ASC operates facilities and provides residential services and other activities for high performance programs at the AIS campus in Canberra. The AIS campus is a 65-hectare multipurpose facility with sporting, administration, commercial and residential functions. Community, sporting and commercial groups also use the campus facilities, and the site is a popular national attraction for visitors. We also operate strategic sports training facilities at Pizzey Park (Gold Coast), the European Training Centre (Varese, Italy), the Reinhold Batschi Men's National Training Centre for Rowing in Yarralumla (ACT) and lease office premises in Melbourne and Sydney.

Our Supply Chains

The ASC operates within a multifaceted and ever-evolving industry, relying on a complex network of domestic and international suppliers and partners to provide a wide range of goods, services, and capital works which are essential in supporting day-to-day operational requirements. Each entity within this network plays a crucial role to ensure the ASC can meet its operational requirements efficiently and effectively, supporting the diverse needs of athletes, coaches, and sports programs across Australia.

All ASC contracts valued at or above the reporting threshold of AUD\$100,000 (GST inclusive) are published on the ASC website biannually and tabled in Parliament as required under the Senate Order on Entity Contracts (Murray Motion). Key ASC supply chains include:

ASC Supply Chain	Description
Food and Catering Services	Food and catering services are essential to the operation of the AIS Dining Hall, providing a variety of nutritious meals and snacks to high performance athletes and visitors staying at the AIS Canberra campus.
Cleaning Services	The AIS campus and other ASC facilities, including offices, residential accommodation, training centres, and sports venues, require cleaning services to ensure they are maintained to the highest standards of cleanliness and hygiene.
Facilities Management, Maintenance and Capital Works	The AIS campus and other ASC facilities require comprehensive maintenance services to remain safe and functional. This maintenance can include minor or major capital works improvements or new construction.
Security Services	Security Services are essential to maintaining safe environments across ASC facilities, events, and training venues for athletes, staff, and visitors.
Sporting Equipment and Apparel	The ASC procures a wide range of sporting goods, including training equipment, uniforms, and competition supplies.
Travel and Accommodation	ASC staff, athletes and teams require extensive travel arrangements, including flights, ground transportation, and accommodation both domestically and internationally.
Professional and Support Services	The ASC engages a variety of professional services suppliers to support its operations, including consultancy services, legal services, marketing, and labour hire/recruitment services.
Information and Communication Technology (ICT)	The ASC's ICT infrastructure is crucial for administrative operations, this includes the purchase of networking equipment, software and hardware.

Risk of Modern Slavery Practices

This section details content to satisfy mandatory criteria 1(c) under section 16 of the Act, describing the risks of modern slavery practices in the operations and supply chains of the ASC.

The ASC recognises that several of its supply chains carry heightened risks of modern slavery due to factors such as geographical locations, the nature of the industries involved, complex subcontracting arrangements, and reliance from certain industries or sectors on low-wage labour. The following table outlines modern slavery risks associated with the ASC supply chains identified as having the highest potential exposure:

ASC Supply Chain	Risk Description
Food and Catering Services	The ASC recognises the food and catering sector presents an elevated risk of modern slavery due to the complexity of food supply chains. These supply chains often include multiple intermediaries and sources from countries with varying labour standards particularly in agricultural production and food processing.
Cleaning Services	The cleaning services industry is one of the highest-risk sectors for modern slavery. Low-wage, migrant, and temporary workers are often employed in cleaning roles, making them vulnerable to exploitative practices such as wage theft, excessive working hours, and unsafe conditions.
Security Services	The security industry is prone to modern slavery risks, especially within subcontracted workforces. Security personnel, often employed on casual or short-term contracts, may be vulnerable to exploitation through excessive working hours, low pay, and poor working conditions.
Facilities Management and Maintenance	The facilities management and maintenance sector can be susceptible to exploitative practices, especially where low-wage or migrant workers are employed. Risks include inadequate pay, lack of job security, poor working conditions, and limited protections for workers under subcontracting arrangements.
Sporting Equipment and Apparel	Sporting goods and apparel supply chains are complex and often involve sourcing from high-risk countries with weaker labour laws. Risks in this sector include forced labour, child labour, and exploitative conditions within manufacturing facilities.

The ASC considers it unlikely that our current and immediate (tier 1) supply chains pose significant risks of modern slavery. However, we acknowledge that we lack comprehensive visibility into our tier 2 and lower-level suppliers, as well as some overseas suppliers. This limited visibility introduces additional risks of modern slavery within these segments of our supply chain.

Current Actions to Address Modern Slavery Risks

This section details content to satisfy mandatory criteria 1(d) under section 16 of the Act, describing the actions taken by the ASC to assess and address these risks, including due diligence and remediation processes.

The ASC is committed to identifying, assessing, and addressing modern slavery risks within its operations and supply chains. Our approach involves consistently reviewing and updating the guidance and procedural processes on the ASC intranet, an internal information resource available to all non-casual employees. This includes the introduction of remediation measures to ensure that all goods and services supporting our operations are sourced ethically and responsibly.

The ASC has implemented thorough pre-engagement risk assessments for high-exposure suppliers operating in high-risk industries, particularly for cleaning, catering, and security services. Prior to engaging these suppliers, we conduct comprehensive due diligence as part of a structured procurement process including detailed evaluations of each supplier's practices related to modern slavery risks. This due diligence also encompasses a review of each supplier's Modern Slavery Statement, submitted in compliance with the *Modern Slavery Act*, to verify their commitment to ethical labour standards and transparency within their operations and supply chains. By engaging these suppliers under extended multi-year arrangements, we strengthen long-term collaboration and enforce accountability measures, thereby reducing the risk of modern slavery and fostering continuous improvement in labour practices.

The ASC also recognises that the sporting equipment and apparel sector, particularly within the textiles and fashion industry, carries a heightened risk of modern slavery due to complex global supply chains and the prevalence of vulnerable labour in overseas manufacturing. The ASC is currently in the process of assessing modern slavery risks involved with the supply of uniforms and merchandise that are available for purchase at the AIS shop. We are actively working with our tier 1 suppliers to ensure they maintain transparent and ethical supply chains and are committed to reducing or eliminating modern slavery risks. This ongoing collaboration is essential to upholding our standards and ensuring that all uniforms and merchandise sourced for the AIS shop align with our commitment to fair and safe labour practices.

The ASC implements stringent controls and assessments to address modern slavery risks within our facilities maintenance and capital works supply chains. Maintenance services are provided by suitably qualified, Australian-based trades, ensuring that all workers operate under safe and fair conditions. For minor works and construction projects, suppliers are required to submit Safe Work Method Statements and conduct comprehensive risk assessments to uphold worker safety standards while on site.

For major capital works procurements that meet the applicable thresholds, the ASC adheres to all Commonwealth Procurement Connected Policies. This includes requiring suppliers to complete a Modern Slavery Supplier Questionnaire as part of the tender response, conducting thorough reviews of submitted Modern Slavery Statements, and incorporating model contract clauses where relevant to enforce compliance. These measures reflect our commitment to identifying and mitigating modern slavery risks, ensuring that all facility and construction-related engagements align with our standards for ethical labour and human rights.

We maintain channels for ASC staff, stakeholders and suppliers to report any suspected cases of exploitation or unethical practices within ASC supply chains or operations. Reports will be investigated promptly, with appropriate actions taken to address any confirmed issues.

Through these comprehensive measures, the ASC seeks not only to identify and mitigate modern slavery risks but to foster an ethical, transparent supply chain that reflects our dedication to human rights and the integrity of Australian sport.

Additional Actions to Address Modern Slavery Risks

To strengthen our commitment to identifying and addressing modern slavery risks, the ASC will continue to undertake existing key actions and introduce new methods and procedures aimed at enhancing awareness, refining processes, and improving oversight across our procurement and operational practices. These actions build upon our current framework and demonstrate our dedication to ethical practices throughout our supply chains.

- Intranet Updates The ASC will continually review and update the internal guidance on modern slavery, accessible via the intranet, to provide ASC staff with clear, practical information on identifying and addressing modern slavery risks in procurement and contract management. This resource will include updated information, risk assessment tools, reporting channels, and best practices, allowing ASC staff to take proactive measures to reduce modern slavery risks. The updated intranet guidance will serve as a central hub for modern slavery related resources, ensuring staff have the latest information and tools to support ethical procurement.
- Procurement Training The ASC will continue to conduct regular procurement training sessions for our ASC staff. This training will cover risk assessment, supplier engagement strategies and contract management practices to help raise awareness of modern slavery practices and the ASC's responsibilities and requirements to comply with the Act. By empowering ASC staff with targeted knowledge and skills, we enhance our capacity to prevent, detect, and address modern slavery risks across high-exposure supply chains.
- **eLearning** The ASC will make the Attorney-General's Department's Modern Slavery eLearning modules available to all ASC staff. This comprehensive training program covers the nature and impacts of modern slavery, how to identify potential risks, and actions staff can take to address these risks in their respective roles.
- Increasing the Use of Whole-of-Australian-Government (WoAG) Panel Arrangements To reduce the exposure to modern slavery risks, the ASC will increase the proportion of procurements conducted through WoAG panel arrangements. WoAG panel suppliers undergo prequalification checks and compliance reviews, reducing the risk of engaging with suppliers that may have unethical labour practices. By leveraging these panel arrangements, the entity ensures that suppliers meet robust ethical standards and comply with Australian Government procurement policies.
- Improving the Monitoring of Modern Slavery Risks in Existing Contracts The ASC will
 enhance its ongoing monitoring of modern slavery risks in existing contracts by working with existing
 ASC contract managers to implement processes to conduct periodic reviews and risk assessments.
 This includes conducting supplier audits, reviewing contract performance, and requiring high-risk
 suppliers to submit periodic updates on their modern slavery mitigation efforts. By actively monitoring
 supplier compliance, we can identify and address any emerging risks, ensuring suppliers adhere to
 ethical standards throughout the duration of the contract.
- Stakeholder Engagement The ASC will continue to work with sport industry bodies to raise
 awareness of modern slavery within and across sporting communities. The ASC will further support
 focusing stakeholder attention to supply chain due diligence by providing access to modern slavery
 tools, information, and resources.
 - The ASC has published modern slavery guidance on the ASC website <u>Modern Slavery |</u>
 Australian Sports Commission (sportaus.gov.au); and
 - This guidance was also circulated through an email marketing campaign to over 3,500 ASC stakeholders including all NSO CEOs and Chairs.
- Supplier Engagement The ASC will promote more transparent relationships with suppliers to encourage open dialogue and collaboration on modern slavery issues. The ASC will encourage regular discussions with suppliers on their efforts to combat modern slavery, provide feedback on their practices, and support them in improving their own modern slavery risk management processes. This partnership-based approach aims to build suppliers' capacity for ethical labour practices and ensure they align with ASC's standards.

Effectiveness of our Actions

This section details content to satisfy mandatory criteria 1(e) under section 16 of the Act, describing the actions taken by the ASC to assess the effectiveness of these actions.

The ASC has implemented a range of mechanisms to assess the effectiveness of our actions in identifying, addressing, and mitigating modern slavery risks within our operations and supply chains. We acknowledge the essential need for continuous review and improvement of our processes to enable us to monitor our progress, refine our approaches, and ensure that our practices align with our commitments.

During the 2023-24 period, the ASC was able to assess the effectiveness of the implemented actions through a number of strategies:

- Monitoring Staff Engagement with Modern Slavery Resources To measure the reach and impact of our internal modern slavery guidance, we monitor engagement with our modern slavery intranet page, tracking metrics such as page views, template downloads, and staff interactions.
 Increased engagement with this page indicates heightened awareness of modern slavery resources, providing insight into how well staff are integrating modern slavery practices into their procurement activity.
- Audit and Assurance of Procurement Documentation for High-Value Procurement To reinforce compliance with modern slavery requirements in high-value and high-risk procurements, the ASC Procurement Team conducts audit and assurance processes to systematically review all procurement documentation at or above the internal threshold. This include checking that modern slavery due diligence processes are completed in the approach to market, and modern slavery clauses are included in the resulting contract as required. This audit function allows for real-time monitoring of compliance with internal modern slavery procurement practices and supports continuous improvement within our procurement processes.
- Support and Modern Slavery Capacity Building Among National Sporting Organisations (NSOs) As part of our commitment to promoting ethical practices across the sporting sector, we provide support to NSOs in understanding and fulfilling their modern slavery obligations. Through our guidance, six NSOs have now registered Modern Slavery Statements, actively assessing and addressing modern slavery risks within their own supply chains. This sector-wide engagement reflects our entity's influence in raising awareness and building modern slavery risk management capacity beyond our immediate operations.
- Employee Procurement Training Participation Metrics By monitoring the participation metrics
 for the procurement training that covers internal modern slavery requirements, we track engagement
 in these training programs and gauge staff understanding and confidence in ASC procurement
 requirements.

Through these measures, the ASC can assess the impact and efficacy of our modern slavery actions, ensuring we uphold our commitment to continuously improve our processes. This structured approach not only strengthens our internal practices but also contributes to a broader culture of transparency and accountability within the sports sector.

This statement was approved by the ASC Board in their capacity as the Accountable Authority for the ASC on 4 December 2024.

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